

EXHIBIT 7

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LIFE AFTER HATE, INC.,
a/k/a EXITUSA,) Docket No. 18 C 06967
Plaintiff,)
v.) Chicago, Illinois
FREE RADICALS PROJECT INC. and) February 22, 2019
CHRISTIAN PICCIOLINI,) 11:24 a.m.
Defendants.)

VOLUME 1

TRANSCRIPT OF PROCEEDINGS - PRELIMINARY INJUNCTION HEARING
BEFORE THE HONORABLE VIRGINIA M. KENDALL

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APPEARANCES: (Continued)

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(Proceedings heard in open court:)

THE CLERK: 18 C 6897, Life After Hate versus Free
Radicals.

THE COURT: Okay. Come on up. You have to introduce
yourselves, folks.

MS. SAPER: Good morning, your Honor. Daliah Saper on
behalf of plaintiff, Life After Hate.

THE COURT: Good morning.

MR. GROTHOUSE: Good morning, your Honor. Matt
Grothouse on behalf of plaintiff.

THE COURT: Good morning.

MR. MONACO: Good morning, your Honor. Chris Monaco
on behalf of plaintiff.

THE COURT: Good morning.

MR. SIPCHEN: Good morning, your Honor. Jim Sipchen.
I represent the counter-defendant and the third-party
defendants.

I'm not participating in the hearing today. I'm just
as an observer, but I'm here --

THE COURT: Okay. Well, welcome to watch. Good
morning.

MR. GEEKIE: Good morning, your Honor. Gene Geekie on
behalf of defendants.

THE COURT: Good morning.

MR. KUO: Good morning. Joe Kuo on behalf of

1 defendants.
2 THE COURT: Good morning.
3 MR. JACOBSON: Good morning, your Honor. Michael
4 Jacobson on behalf of defendants.
5 THE COURT: Okay. Good morning, folks.
6 And who are you over here? Representatives of the
7 entity?
8 Please introduce them.
9 MR. GEEKIE: Standing now is Chris Schultis, a
10 paralegal from our office --
11 THE COURT: Nice to meet you.
12 MR. GEEKIE: -- who will be our technology expert
13 today, Judge.
14 And then Christian Picciolini, representing -- one of
15 the defendants --
16 THE COURT: Good morning.
17 MR. GEEKIE: -- representing Free Radicals Project
18 THE COURT: Okay. Thank you. Good morning.
19 And at your table, please?
20 MS. SAPER: We have Mr. Sammy Rangel and Mr. Tom
21 McAleer, both representatives of plaintiff, Life After Hate.
22 THE COURT: Good morning, gentlemen.
23 Okay, folks. So the way that I'd like to proceed is
24 to do short openings, and then you can go on and call your
25 first witnesses, okay?

1 MS. SAPER: That's -- if I may, your Honor. We
2 debated whether or not the video testimony should be allowed.
3 We discussed the fact that the deposition should have already
4 taken place per Judge Cole's --
5 THE COURT: I know all of this, but I told you what my
6 ruling was.
7 MS. SAPER: Right, and it's not -- it's still a video
8 deposition per your ruling. We're not going to Florida.
9 THE COURT: A video deposition where she's going to be
10 down there and -- but you're still talking about testifying,
11 and that's not what I had planned because the idea was that you
12 have records with each other -- I mean documents that you want
13 to cross-examine and direct her with, and we weren't going to
14 put her up cold. I was going to let you put a deposition
15 together, and then submit to me what you want to submit as part
16 of the record.
17 MR. GROTHOUSE: I see.
18 THE COURT: How is that not -- I've said this now five
19 times.
20 MS. SAPER: Okay.
21 THE COURT: What is different -- what is misunderstood
22 about that?
23 MR. GROTHOUSE: I think we were just confused because
24 the original motion that we filed was just to have --
25 THE COURT: Right, but your motion -- both of your

1 MR. GROTHOUSE: Your Honor, as a preliminary matter,
2 we just -- perhaps it would be good just to have some
3 clarification on the order yesterday. I think we were --
4 plaintiffs were somewhat confused. I think the order came down
5 this morning regarding the testimony of Angela King.
6 We were unsure, I guess, after the hearing yesterday.
7 We know that the -- I think you stated on the record that the
8 defendants should depose Ms. King at a point after the hearing,
9 but we also believe that Ms. King was also going to be able to
10 testify via video conference today. We were planning to do so
11 accordingly.
12 THE COURT: Oh, that wasn't my understanding.
13 My understanding was since she's not well and you were
14 going to depose her, that you would depose her where she is in
15 Florida and submit the deposition to me to supplement the
16 record today.
17 MR. GROTHOUSE: So, yeah, I apologize for the
18 confusion. I know there's a lot of moving parts to this case,
19 and you're very busy with all your cases. But the motion
20 yesterday by the defendants was asking the Court to bar
21 Ms. King's testimony --
22 THE COURT: Right, and I didn't grant that motion. I
23 said that she could testify, but I wasn't going to require her
24 to come up here, but that you could depose her down where she
25 is ill and supplement the hearing record.

Opening Statement - Ms. Saper

1 motions were denied in part because I gave you my ruling on how
2 it was going to work.
3 MR. GROTHOUSE: That makes sense.
4 THE COURT: So neither of you won all of what you
5 wanted.
6 MR. GROTHOUSE: Gotcha.
7 THE COURT: Okay? All right. So let me have
8 openings, please.
9 And the rest of you can sit down.
10 MR. GROTHOUSE: Thank you.
11 OPENING STATEMENT BY MS. SAPER:
12 MS. SAPER: All right. Good morning, your Honor.
13 Life After Hate, plaintiff, seeks to stop defendant,
14 Christian Picciolini, individually, and through his
15 organization, Free Radicals Project, from holding himself out
16 as the owner of its ExitUSA program and from using Life After
17 Hate's other registered trademarks, taglines, and public
18 service announcement videos in a confusing manner.
19 By way of background, Life After Hate is an Illinois
20 non-profit organization founded in 2011 by former white
21 supremacists. They often refer to themselves as formers. The
22 mission of the organization is to help extremists exit from
23 hate groups and to denounce toxic ideologies.
24 THE COURT: Hold on just a second. You've got a buzz.
25 Call the computer folks to come on up and see what our

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Opening Statement - Ms. Saper

1 glitch is.
 2 No, go back in chambers, please.
 3 We hooked up these tables for my trial next week, and
 4 it might be something electronically.
 5 But can you hear okay to continue?
 6 COURT REPORTER: Yes, Judge.
 7 THE COURT: It's still there, but as long as you can
 8 hear okay, we'll continue.
 9 All right. Go ahead. Sorry about that --
 10 MS. SAPER: Sure.
 11 Because so much of what Life After Hate, the
 12 organization, does centers around their exit work, helping
 13 formers exit from these ideologies, in 2015 Life After Hate
 14 registered a d/b/a, doing business as, for ExitUSA with the
 15 Illinois Secretary of State.
 16 With the help of an advertising agency, Life After
 17 Hate then developed logos and taglines for its ExitUSA trade --
 18 USA program and negotiated the purchase of the ExitUSA.org
 19 domain name.
 20 It also established Twitter, YouTube, and Facebook
 21 accounts for ExitUSA.
 22 Life After Hate relies heavily on the internet to
 23 conduct its activities, including its outreach and education
 24 services.
 25 In fact, many of the board members and staff live in

1 Life After Hate's predecessor organization, which was a
 2 Wisconsin non-profit called Life After Hate. This was created
 3 in 2010 in Wisconsin before the Illinois organization was
 4 created. Life After Hate, the Wisconsin organization, was
 5 primarily centered around a website which Arno had developed
 6 created, and he sought the help of other formers he had met to
 7 populate that website with articles, essays written by these
 8 formers.
 9 The website was also an extension of a book Arno
 10 authored. It's called "My Life After Hate."
 11 So Christian, Sam, and others contributed content to
 12 Arno's website until they realized that their collective
 13 experience could be better served by a new non-profit. Indeed,
 14 Sammy and Angela, for example, have almost 15-plus years in
 15 prison under their belts. They -- they were the perpetrators
 16 of violent crimes, and they've since been reformed. In the
 17 last 20-plus years, they've devoted their life to helping
 18 others not fall in the same trap.
 19 THE COURT: Hold on just a second.
 20 We were getting a lot of static in the background, and
 21 I don't know where it might be coming from. Now I don't hear
 22 it, of course, once you arrived.
 23 (Off-the-record discussion.)
 24 THE COURT: Sorry about interrupting you again. We
 25 want to make sure you have a good record. And if there's

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1 multiple different countries and states, so, necessarily, they
 2 need the internet to communicate with all of their -- the
 3 people they're counseling, their donors, et cetera. So it
 4 cannot be overstated how important the non-profit's website and
 5 social media platforms are.
 6 Life After Hate fields questions from potential
 7 formers or media outlets via its platforms, and it also
 8 disseminates educational content on these platforms.
 9 Life After Hate also monitors the data analytics from
 10 these platforms in order to see how many people have visited
 11 their site and how many people they've helped or engaged with
 12 on these -- on these platforms.
 13 Defendant Picciolini was one of Life After Hate's
 14 cofounders. Certainly instrumental in the beginning, and he
 15 was a very active member of the organization.
 16 He cofounded it, along with Sammy Rangel who is here
 17 today, Tony McAleer who is also here today, Angela King who we
 18 just discussed, and an individual named Arno Michaelis. And I
 19 might be pronouncing his last name incorrectly. There were a
 20 couple others, but these are the key players for the purposes
 21 of today's hearing.
 22 Arno Michaelis can be credited for creating --
 23 COURT REPORTER: Arno? Can you --
 24 MS. SAPER: Arno, A-R-N-O. And his last name is like
 25 Michael E-L-I-S, so Michaelis -- can be credited for creating

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Opening Statement - Ms. Saper

1 something crackling in her ear, it won't be the best record.
 2 MS. SAPER: Understood.
 3 THE COURT: Okay. Go ahead.
 4 MS. SAPER: I was just giving background on the
 5 predecessor organization.
 6 THE COURT: So if you could go back to where you
 7 mentioned that Mr. Michaelis wrote the book "Life After Hate"
 8 and then pick up from there, I would appreciate it.
 9 MS. SAPER: Sure.
 10 So as I was mentioning, the organization was
 11 predicated on Life After Hate, the website. And the website
 12 was really an extension or a derivative of Arno's book, "My
 13 Life After Hate," which he authored well before the website was
 14 created.
 15 Ultimately, Arno, through his efforts, through the
 16 website, and through Christian's help, the defendant Christian
 17 Picciolini, and Sammy Rangel's help, they all decided that
 18 because of their collective experience -- each of them have
 19 different backgrounds and experiences in the white supremacist
 20 movement, and as I mentioned, including Angela and Sammy with
 21 very violent criminal records who have since been reformed and
 22 who are dedicating their life to not being that way -- they
 23 decided that it would be great for them to create a new
 24 organization through their collective efforts and create the
 25 Illinois non-profit in 2011.

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Opening Statement - Ms. Saper

1 So once the Illinois non-profit was created, Arno
2 abandoned his Wisconsin non-profit to serve as the Illinois
3 non-profit's executive director. All of the other individuals
4 I named were considered -- I should say Tony, Sammy, Frank
5 Meeink, and a Michael Abramson were the other directors of the
6 Illinois corporation when it was created.

7 Arno transferred the LifeAfterHate.org domain name to
8 the Illinois Life After Hate non-profit. And, in fact, that
9 domain name is the same one that Life After Hate has been using
10 since its inception. LifeAfterHate.org.

11 Arno ultimately parted ways with Life After Hate in
12 2012.

13 Before he left, defendant Christian Picciolini, acting
14 as executive board chair of the Illinois Life After Hate, the
15 Illinois non-profit, demanded that Arno relinquish any rights
16 or access he may have had to the Life After Hate domain name
17 his email, and Life After Hate YouTube account, and another
18 account called Kindness, Not Weakness on Twitter.

19 And I'll quote Mr. Picciolini's own words.

20 He says: Arno, it is important that we make as clean
21 a break as possible to maintain the organization. And the
22 assets of Life After Hate and Kindness, Not Weakness belong to
23 the organization. That includes the YouTube and your
24 Arno@LifeAfterHate.org email address. Will need the KNW,
25 referring to Kindness, Not Weakness, Twitter credentials.

1 weren't able to use those two accounts after Mr. Picciolini was
2 asked to leave the organization in August of 2017.

3 As soon as Life After Hate became -- sorry, I should
4 just quickly, Mr. Picciolini left the organization in 2017. A
5 couple months later, Life After Hate discovered that its
6 domains were pointing to ChristianPicciolini.com.

7 So as soon as they became aware of those actions, they
8 sought counsel. They immediately registered their trademarks
9 which they ultimately obtained. They had registered trademarks
10 for Life After Hate and ExitUSA. And they sent Mr. Picciolini
11 a demand letter asking him to cease the infringing behavior.
12 This occurred in November of 2017, as soon as they became aware
13 of it.

14 Mr. Picciolini did not stop. He doubled down on his
15 position. He filed, in our opinion, fraudulent copyright
16 registrations. He unsuccessfully attempted to file his own
17 ExitUSA trademark, which was rejected by the USPTO for being
18 too confusing to Life After Hate's mark. And then he hires his
19 own lawyers and sent a letter inexplicably claiming that he is
20 the owner of all of Life After Hate's assets. Since he
21 couldn't get the trademark for ExitUSA, he then proceeded to
22 create a new organization which he called Free Radicals
23 Project.

24 Life After Hate breathed a sigh of relief thinking
25 that Mr. Picciolini had moved on. Okay. They have no problem

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Opening Statement - Ms. Saper

1 Arno, of course, responded with some resistance.
2 Christian followed up with: I hope you'll be considerate and
3 relinquish it. Keeping it yourself will be confusing.

4 Arno ultimately returned that -- all of those assets.

5 Five years later, in 2017 until now, Mr. Picciolini is
6 the one trying to run away with Life After Hate's assets.

7 And as I say, unlike Arno, who ultimately did return
8 all of those social media accounts -- and he's currently still
9 using "My Life After Hate" in connection with his book and his
10 public speaking, with Life After Hate's knowledge and
11 permission, and he's not doing it, at least to our knowledge,
12 in a confusing manner -- unlike that, Mr. Picciolini has not
13 only kept the ExitUSA.org domain name, the ExitUSATeam Twitter,
14 and ExitUSA YouTube channel, but, instead, he has converted it
15 so that the public at large would think that ExitUSA is
16 Christian's personal organization and not a program of Life
17 After Hate.

18 If an individual hears about the ExitUSA program or
19 they read one of the many publications that exist online that
20 has a link to ExitUSA.org, a program of Life After Hate, they
21 would click on it -- it's since stopped -- but after he left,
22 they would click on it and it would go to
23 ChristianPicciolini.com\ExitUSA.

24 Additionally, the YouTube account and Twitter account
25 were no longer under the control of Life After Hate, so they

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Opening Statement - Ms. Saper

1 with Mr. Picciolini having a competing organization, doing the
2 exact same services in the exact same places. They just want
3 it to be a clear and distinct organization from their own.

4 So instead of going off with Free Radicals Project and
5 creating his own organization, Mr. Picciolini proceeded now not
6 to redirect ExitUSA.org to ChristianPicciolini.com, but then it
7 directed to FreeRadicalsProject.org.

8 He also renamed his social media accounts, the Life
9 After Hate Twitter account, from @ExitUSATeam, the handle then
10 read @ExitUSATeamNow@FreeRadicalsProject.org.

11 So left with no other options and after all of its
12 appeals short of litigation failed, Life After Hate finds
13 itself in this courtroom.

14 Even after it filed this lawsuit, plaintiff asked for
15 a settlement conference with Magistrate Judge Cole so that both
16 parties could focus their energies and hard-earned donations
17 not on fighting, but on meaningful and impactful programming.

18 Defendant has refused to engage in that mediation.
19 And, instead, we've had four months of grueling discovery.
20 That discovery has not yielded much of the documents we've
21 asked for in order to be able to present our case. Indeed,
22 after filing two motions to compel and having lengthy hearings
23 before Judge Cole, Life After Hate never received much of that
24 production. Part of the explanation is that Mr. Picciolini
25 claims that the Free Radicals Project is a not operating --

Opening Statement - Mr. Geekie

Opening Statement - Mr. Geekie

not operational organization. It's just -- it just something I'm creating and I'm holding as a placeholder. And, therefore, despite the fact that there's an active website, active social media accounts, and active marketing of Free Radicals Project as recently as January where Free Radicals Project is discussed in a podcast by Mr. Picciolini, the claim is: We can't give you documents because it does not exist and it's not functional.

Today you'll hear from two cofounders of the organization, Mr. Sammy Rangel and Tony Rangel [sic.]. They're going to testify about the facts surrounding the Wisconsin corporation, the creation of -- the creation of the Life After Hate domain name, then the creation of the ExitUSA programming trademarks, and then the use by Mr. Picciolini after his termination and the extent to which that use was confusing.

In addition to their testimony and the evidence we will submit today, we believe that plaintiff's motion for preliminary injunction meets all of the elements and should be granted.

THE COURT: Okay. Thank you.

And you'll take the opening for me?

OPENING STATEMENT BY MR. GEEKIE:

MR. GEEKIE: Thank you, Judge. I'll try and be brief because I want to get to the evidence, see what evidence plaintiff has, because plaintiff really doesn't have any

produced it. He paid for it. And he copyrighted it. And that is posted on his website.

THE COURT: When?

MR. GEEKIE: Couple of years ago.

And so -- and he will testify that he had treatment-- what they call in the creative world -- treatment of a description of that long before Life After Hate was even started.

So he's -- those are the PSAs that are at issue here.

But what this really comes down to is who used Life After Hate first? Was it the Illinois company or the Wisconsin company? And who has the right here to obtain an injunction if one should be given?

Now, Mr. Picciolini says no injunction is needed because he's not using Life After Hate or ExitUSA.

He does intend to sue and is claiming here that he rightfully owns those, and he'll seek to invalidate the trademarks of Life After Hate.

But the -- and then the issue of the redirecting that was mentioned. The evidence you will hear is that that redirection was done by Mr. Picciolini before he left Life After Hate because he was the program director.

The evidence will show that ExitUSA was a process. What it was was this is an entity that helped people exit or leave violent extremist groups. And they created a program

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Opening Statement - Mr. Geekie

evidence.

Now, as Ms. Saper mentioned to you, at the drop of a hat they file motions to compel. But that isn't evidence here. The fact is that they want evidence to exist, but there isn't any evidence, and so they're going to try and make this case because they have no evidence about what's not there.

They don't have evidence to support infringement. They don't have evidence to support what they have to prove to get an injunction here.

The reason is Mr. Picciolini and Free Radicals Project, a company he founded, are not holding themselves out as Life After Hate or ExitUSA.

Now, Mr. Picciolini does maintain that because he created the trademarks Life After Hate and ExitUSA, and the evidence will show that he used them before the Illinois Life After Hate company was founded, when he was involved in the creation of the Wisconsin company called Life After Hate, and that company in Wisconsin still exists.

And, your Honor, Mr. Picciolini claims that he owns these terms and that they were fraudulently trademarked by the plaintiff, the Illinois Life After Hate company.

Now, he also -- there was mention of these public service announcements. And one of the public service announcements that he has up on his website is called "There Is Life After Hate." That's the name of it. He created it. He

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Opening Statement - Mr. Geekie

that they called ExitUSA.

Mr. Picciolini created that because he's an internationally known intervention counselor. He's been on *60 Minutes*. He has his own TV show on MSNBC. He's written a book that's well recognized. He is the go-to person in the United States. The FBI even consulted him and had him on a team to create their extremist project.

So what he did is he ran this program, this process called ExitUSA. And before he left, he had it directed to his website because he wanted people to be able to reach him if they were out looking for help because he was the leading intervention expert.

As soon as he got the cease and desist letter, because he didn't remember that he had that redirection -- once he got the cease and desist letter, he stopped the redirection.

So in the end, your Honor, it's our position that these trademarks were obtained fraudulently because it was misrepresented when they were first used. They were first used by Mr. Picciolini and Mr. Michaelis when they founded the Wisconsin company.

The evidence will also show that now the plaintiffs and Mr. Rangel have fraudulently reinstated the Wisconsin company in an attempt to seize the rights that the Wisconsin company has in these trademarks.

Now, in the end, though, the defendants have to show a

Opening Statement Mr. Geekie

Rangel - Direct by Grothouse

1 likelihood of success. And they can't.
 2 They also have to show infringement. And they won't
 3 be able to do that today.
 4 They also have to show a likelihood of confusion by
 5 who their consumers are. They can't even identify who their
 6 consumers are, whether they are the exiting people, what they
 7 sometimes call formers, people leaving these extremist groups.
 8 Well, those people get the services for free. Mr. Picciolini
 9 gives them services for free. Life After Hate gives them
 10 services for free. So are the consumers the people who donate
 11 money? They don't know. They can't describe it.
 12 And they can't tell you what the likelihood of
 13 confusion is because there is no confusion out there.
 14 And then, finally, there's no threat of imminent harm
 15 here. As you heard, they're trying to get ahead of the curve
 16 on Mr. Michaelis. Mr. Michaelis is out there acting as Life
 17 After Hate. Not only does he have a book called "My Life After
 18 Hate," his website talks about "My Life After Hate." His
 19 website raises funds using the term "My Life After Hate." He
 20 speaks using the "Life After Hate" term. Penn State University
 21 is hosting a speaking engagement by Mr. Michaelis in April and
 22 it's called "Life After Hate."
 23 So the plaintiff is aware that Mr. Michaelis -- or
 24 Michaelis, I'm sorry -- Mr. Michaelis is out there using the
 25 trademark, and they're doing nothing about it.

1 Q Good morning, Mr. Rangel.
 2 A Good morning.
 3 Q Can you state your full name for the record?
 4 A Sammy Rangel.
 5 Q Thank you.
 6 Mr. Rangel, can you tell me where you were born and
 7 where you live now?
 8 A Sure.
 9 I was born in Lubbock, Texas, 1969.
 10 My family moved to Illinois when I was very young,
 11 three or four years old. So I grew up out here in Illinois for
 12 quite a while and in the suburbs.
 13 But I've lived in Wisconsin for about the last 20
 14 years now, in Racine, Wisconsin.
 15 Q Thank you.
 16 Can you tell me your involvement and participation in
 17 any hate organizations or hate groups growing up?
 18 A Sure.
 19 I -- I joined -- I was recruited, joined into a
 20 Chicago-based gang called Maniac Latin Disciples, and I was a
 21 member from the age of 11 until about the age of 27.
 22 In that time, I became a high-ranking gang member at
 23 the age of 17 and remained so until my exit approximately in
 24 1997.
 25 Q And during this time that you were a gang member, did you

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Rangel - Direct by Grothouse

1 Moreover, Judge, and, finally, the evidence will show
 2 that the plaintiff sent a cease and desist letter in 2017, and
 3 they didn't sue until 2018. They waited a year. And that
 4 waiting a year shows that there's no threat of imminent harm.
 5 If there was a threat of imminent harm, they would have sued
 6 right away. But by waiting a year, that is an admission by
 7 them that there's no threat of imminent harm here, and no need
 8 for an injunction.
 9 Thank you.
 10 THE COURT: Okay. Are you ready to call your first
 11 witness?
 12 MR. GROTHOUSE: Yes, your Honor.
 13 THE COURT: Okay.
 14 MR. GROTHOUSE: Plaintiff would like to call Mr. Sammy
 15 Rangel.
 16 THE COURT: Okay.
 17 (Approaching.)
 18 THE COURT: Right up here, sir.
 19 Please raise your right hand.
 20 (Witness duly sworn and takes the stand.)
 21 THE COURT: Okay. Have a seat.
 22 And whenever you're ready.
 23 SAMMY RANGEL, PLAINTIFF'S WITNESS, SWORN
 24 DIRECT EXAMINATION
 25 BY MR. GROTHOUSE:

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Rangel - Direct by Grothouse

1 commit any crimes?
 2 A I committed many crimes, both as a juvenile and as an
 3 adult. In and out of institutions, prisons, jail. Sent out of
 4 state as a juvenile for being violent and aggressive. Mental
 5 institutions as a child for my behavior. And then at 17, I was
 6 convicted as an adult for car theft here in Chicago, I believe,
 7 and was sentenced to prison. Ended up in Menard Correctional
 8 Institution, which is Southern Illinois. And there I survived
 9 a race riot, fighting against white supremacists. And then
 10 spent several years in Wisconsin prison for more violent gun
 11 crimes.
 12 Q When was the last time that you were convicted of a crime?
 13 A 1994, battery to a correctional officer.
 14 Q So what changed you?
 15 A There was a person who worked at the maximum prison that I
 16 was in who reached out to me while I was in segregation for
 17 being aggressive and violent in prison. And that -- through
 18 that interaction, he somehow found a way through all my
 19 defenses, and he made me start to wonder about my life. But it
 20 wasn't until several years later when I was asked to
 21 participate in a prison program, a rehabilitation program. And
 22 it was there that I heard some things, went through some
 23 things, went through -- started my personal development to get
 24 my life together and renounced my gang membership and decided
 25 to do some of the work I'm doing today.

1 Q Can you tell me what you did prior to getting involved in
2 Life After Hate?
3 A I -- I'm in the -- I'm a mental health professional. I've
4 been in the non-profit world for about 20 years. I've directed
5 outreach programs for high-risk youth. Drug and alcohol
6 counselor. Domestic violence counselor. I did a lot of the
7 AODA-related services for the state as a therapist. And I
8 still do some contract work with the county that I live in
9 dealing with violent adults and parents.
10 Q Can you tell me how you were first introduced to Life After
11 Hate?
12 A Sure.

13 Earlier in 2010, I had been interviewed by Channel 58,
14 Mike Strehlow, a program called Racine and Me. And they were
15 highlighting my work, my past, of course, my new life. And
16 that video was sent to Chicago to have like edits edited --
17 subtitles put onto the video. And there was a woman there who
18 actually knew Arno. I didn't know her. She just was a random
19 person. And when she heard and saw my story, she reached out
20 to Arno, and Arno then reached out to me to say he wanted to
21 meet. He had -- he had been connected with me.

22 And so it was like in June -- end of June of 2010 when
23 me and Arno met for the first time, and I was introduced to --
24 to what he was calling Life After Hate, introduced to the work
25 that he was trying to do.

1 Q And by Arno, you mean Mr. Arno Michaelis.
2 A Arno Michaelis. Yes, sir.
3 Q And who is he?
4 A Arno Michaelis is, to my knowledge and my experience with
5 him, it was the person who had thought of Life After Hate, and
6 it was an online journal at the time. He told me he had
7 interest in doing some speaking. And I'm, like: Well, I'm on
8 a speaking trail, I can help you out.
9 And that's kind of where -- where we started out.
10 Q So you met Arno and got involved in Life After Hate before
11 the Illinois non-profit formed.
12 A Absolutely. Yes, sir.
13 Q And what did you do for the organization before the
14 Illinois non-profit formed?
15 A Arno asked me if I like to write, and I was writing my own
16 book at the time and I had written other stories. And so I
17 shared some stories I had written, written a few articles for,
18 stories related to social justice issues or change or recovery.
19 And then Arno let me know that he wanted to do public speaking
20 on behalf of Life After Hate. And I told him I could help him
21 by opening the doors to the areas where I was doing public
22 speaking. And so I introduced him to some people.
23 Q So when you got involved, what was Life After Hate?
24 A Really it was -- it was Arno, as far as I could tell,
25 because, you know, my -- my involvement. I met a few of the

1 other players like Angie, Bernie. People who were major
2 contributors to the paper, to the online organization. But it
3 was really an online journal. And Arno was trying to address
4 social justice issues. And so people interested in that would
5 contribute articles.
6 Q How many articles did you contribute to the online journal?
7 A It was 20-plus articles early on, and then throughout, you
8 know, that year or so after I met Arno.
9 Q And where was this online journal located? What was the
10 website?
11 A It was LifeAfterHate.org. Arno was, you know, always
12 looking for art and putting articles up there and -- it's easy
13 to find. It was -- it seemed to be doing well, in my opinion.
14 Q And you mentioned that you helped Arno get into schools.
15 Can you talk about that?
16 A Sure.
17 So when I first met Arno, one of the first things he
18 said to me was I would like to talk at schools. And I'm, like,
19 I can help you, I'm in schools, I do that all the time, I've
20 been doing that for like ten years.
21 So I brought Arno to a school. And it created such a
22 stir that I was actually able to also interest like a
23 journalist to come in and speak with Arno because I wanted to
24 get -- you know, I was excited for Arno. I thought he was a
25 fascinating person.

1 And then out of some of those presentations at the
2 local schools that we were doing, these kids had went around
3 and put up little quotables, men -- like mentions of our
4 speeches around the school. And one of those was Kindness, Not
5 Weakness. And so me and Arno focused in and zeroed in on that.
6 We're, like, well, maybe what we're doing together, we
7 can call it, you know, under the banner of Kindness, Not
8 Weakness, the title that the kids had came up with.
9 And so very soon after that, me and Arno launched the
10 Kindness, Not Weakness portion of Life After Hate.
11 Q Let me fast-forward to 2011 and your trip to Dublin. Can
12 you talk about that?
13 A Sure.
14 Again, because of my affiliation with Arno, I was --
15 my name was thrown in a hat to go to Ireland. And then that's
16 why I became more aware of players like Frankie, Tony Angela,
17 Christian, who were also going to Dublin. And we were really
18 excited about that. And so we, because of our backgrounds, our
19 stories, they vetted us out, you know, to ask us like about
20 our -- you know, if we'd qualify to go. And when we did, we
21 got the invitation. So we all flew out to Ireland. And for
22 the first time, that's when I met everyone that was -- that
23 would go on to become a part of the new non-profit later.
24 And while we were there on one of the last days, we
25 all kind of were communicating this sense of like comradery

1 that we wished we could have had when we started our change
2 process, because when a lot of us changed, we were by
3 ourselves. There was no help, no support, no other formers, so
4 to speak, to guide us, support us, lend their experience to us.
5 And we said if we could use that, there are others that could
6 use that.

7 And it was really out there on that patio on that last
8 day of that conference that we decided we could come back and
9 do something like that for these people.

10 And that's when we all committed to coming back and
11 starting the non-profit called Life After Hate as you know it
12 today.

13 Q So what happened when you came back from that trip?

14 A Tony, Frankie, Christian, there was an attorney -- I wasn't
15 friends with the attorney. I believe that was Christian's
16 friend or connection somehow. Angela. You know, the plan was
17 to move forward with launching the non-profit. And then I know
18 that they -- the team put in paperwork to file that non-profit
19 And in a very quick turn-around, maybe within a couple of
20 months, we were notified eventually that we became a
21 non-profit. And if I remember correctly, we had a cookout at
22 Christian's house to kind of celebrate the progress that we had
23 made becoming a non-profit.

24 Q So to your knowledge, all of the people involved with Life
25 After Hate that you knew before the non-profit, Illinois

1 BY THE WITNESS:

2 A -- which was the first of its kind. It was put on by
3 Google Ideas, Tribeca Films, the Council on Foreign Relations
4 There was a number of key players in that. And they brought
5 formers from all over the world, men and women who had been
6 involved in extremist groups, victims of extremist attacks, and
7 then, of course, other interested parties, political,
8 non-political. And we were there to kind of brainstorm
9 possible solutions, programs, et cetera.

10 BY THE COURT:

11 Q Okay. And name specifically the individuals who were with
12 you on the London trip -- on the Dublin trip.

13 BY THE WITNESS:

14 A Sure.

15 Christian, myself, Arno, Tony Mack, Angela King, and
16 Frankie Meeink, and T.J. Leyden.

17 BY THE COURT:

18 Q Okay. And then when you said you returned and "we" put in
19 paperwork to become a non-profit, who is "we"?

20 BY THE WITNESS:

21 A Tony, Frankie, Arno, Christian, the attorney. At some
22 point we all had, you know, input or something to do with
23 that --

24 BY THE COURT:

25 Q Okay --

1 non-profit was formed, what happened to them after the
2 non-profit was formed?

3 A They all came over to the -- to the non-profit once it was
4 formed. Some of them were on the board. Some of them remained
5 in an advisory committee -- a capacity. Some of them continued
6 to contribute articles. Open up doors for us for
7 presentations. So everyone that was doing it before more or
8 less came over and just joined with the new organization.

9 Q So what about the LifeAfterHate.org website?

10 A That was -- what I know about that, that was basically
11 operating under the Illinois organization or that was given to
12 the -- it was -- it was absorbed into the company with
13 everything else, including the Kindness, Not Weakness program
14 that me and Arno created. I had no qualms about that. Just --
15 it was just given right to the organization.

16 BY THE COURT:

17 Q I have to stop you because it's too loose.

18 First of all, what was the trip to Dublin? What
19 conference? What was the conference?

20 BY THE WITNESS:

21 A Sure.

22 The conference was titled "The Summit Against Violent
23 Extremism" --

24 BY THE COURT:

25 Q Okay.

1 BY THE WITNESS:

2 A -- so it's a little bit of a process.

3 BY THE COURT:

4 Q And what was the name of the non-profit?

5 BY THE WITNESS:

6 A LifeAfterHate.org.

7 BY THE COURT:

8 Q And what state was it -- put the paperwork in for what
9 state?

10 BY THE WITNESS:

11 A Illinois.

12 BY THE COURT:

13 Q Okay. And so that is in what time of year in 2011?

14 BY THE WITNESS:

15 A We were -- we were applying from July to August 2011.

16 BY THE COURT:

17 Q Okay. All right. Thanks.

18 THE COURT: Now you can continue.

19 MR. GROTHOUSE: Thank you, your Honor.

20 BY MR. GROTHOUSE:

21 Q Okay. So the program that you were talking about,
22 Kindness, Not Weakness, that you developed with Arno before the
23 Life After Hate non-profit Illinois organization was formed,
24 what happened to it?

25 A It was absorbed into the company, but over time it just

1 died by attrition because of, you know -- it's still there,
 2 like the website is still -- or the Facebook page is still
 3 there. As we just grew and changed and morphed into what we've
 4 become today, I don't think it really became a key focus of
 5 programming for us.
 6 Q So who owns that Facebook page?
 7 A I know I'm an administrator on it. Life After Hate does --
 8 that's -- that's -- we can still monitor that page. But like I
 9 said, we're not doing much on it.
 10 Q Can you tell me what happened, to your knowledge, to the
 11 unincorporated group that put together and put on the online
 12 journal once the non-profit -- Illinois non-profit was formed?
 13 A It just became a part of our new organization, Life After
 14 Hate, the non-profit.
 15 Q And all the personnel from the Wisconsin entity?
 16 A Just moved right into -- it seemed like a very seamless
 17 transition, just moved right into the organization. Everything
 18 that we were doing before we continued to do now under the flag
 19 of Life After Hate, the new non-profit.
 20 Q Understood.
 21 BY THE COURT:
 22 Q Okay. Can you be specific about who you just -- you can't
 23 be so general.
 24 Who was -- first he mentioned an unincorporated group
 25 that was doing the journal. So who is that? Who is that?

1 that I didn't know, but I knew they were part of the team.
 2 But, again, all of us, when -- when the non-profit was
 3 registered, continued to work together in the same capacity now
 4 under the new non-profit that we had created.
 5 THE COURT: Okay. Counsel, so this is your question:
 6 MR. GROTHOUSE: Sure.
 7 THE COURT: (Reading:) Can you tell me what happened,
 8 to your knowledge, to the unincorporated group that put
 9 together and put online -- put on the online journal once the
 10 non-profit, Illinois non-profit was formed.
 11 And his answer was: (Reading:) It just became part
 12 of our new organization, Life After Hate, the non-profit.
 13 And then the question was: (Reading:) And all the
 14 personnel from the Wisconsin entity?
 15 (Reading concludes.)
 16 THE COURT: So I need to be specific --
 17 MR. GROTHOUSE: Sure.
 18 THE COURT: -- when you're referring to the
 19 unincorporated group that put together the online journal in
 20 Illinois, who is that? And who is the personnel from
 21 Wisconsin?
 22 MR. GROTHOUSE: Sure.
 23 THE COURT: And how do they get together, please?
 24 MR. GROTHOUSE: Sure. Sure. I can clarify that, your
 25 Honor.

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1 BY THE WITNESS:
 2 A That would be Life After Hate, the online journal.
 3 BY THE COURT:
 4 Q Okay. Only Arno?
 5 BY THE WITNESS:
 6 A I lived in Wisconsin, so I saw Arno all the time. I rarely
 7 heard or saw Christian. I don't think I ever saw Christian
 8 contribute in the time that I was working with Arno before we
 9 became the non-profit. He was kind of like a -- like I knew he
 10 was out there, but I didn't see -- just like I knew T.J. was
 11 out there, Angela, I didn't have much to do with them, but --
 12 BY MR. GROTHOUSE:
 13 Q But he -- but Christian did contribute --
 14 A Absolutely, yeah. And Arno would let me know what
 15 Christian was doing, because I didn't ever observe what
 16 Christian was doing.
 17 Q Who else contributed to --
 18 A Sure.
 19 There were a number of people who aren't even
 20 mentioned today. So all of the core team that I mentioned.
 21 Myself, Angela, Frankie, Tony, Christian. There -- Bernie, I
 22 don't remember -- I think her last name was Bernie Zchong
 23 (phonetic), Angela Aker, and there were others. I just didn't
 24 know them very well. I had never met them in person. But
 25 there were -- there were always people on the conference call

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1 BY MR. GROTHOUSE:
 2 Q So as Sammy was just talking about, all the people
 3 involved --
 4 THE COURT: No, you can't -- you have to do it through
 5 testimony, so --
 6 MR. GROTHOUSE: Yes, yes.
 7 BY QUESTIONER:
 8 Q So, Mr. Rangel, can you tell me, to your knowledge, who was
 9 involved in the group that put on the online journal?
 10 A Can I name them?
 11 Q Correct.
 12 A Sure.
 13 Arno Michaelis would have been the key player.
 14 Myself. Bernie. Angie. Frankie. Tony. Angela. Christian.
 15 Again, there are others that I can -- I can't remember their
 16 names. But there were more than just those people doing that
 17 stuff for the online journal.
 18 THE COURT: Okay. I have a question on that.
 19 BY THE COURT:
 20 Q And when you say "online journal," what are you referring
 21 to? A website.
 22 BY THE WITNESS:
 23 A It's -- yeah. So Life -- to me, Life After Hate was an
 24 online journal before it became a non-profit. That's how --
 25 that's what Arno was doing.

1 BY THE COURT:
2 Q Okay. And the online journal is a website?
3 BY THE WITNESS:
4 A It's a website, yes.
5 BY THE COURT:
6 Q And the website has what domain name?
7 BY THE WITNESS:
8 A Life -- it had LifeAfterHate.org.
9 BY THE COURT:
10 Q Okay. And then Arno, yourself, Bernie, Angie, Frankie,
11 Tony, Angela, and Christian are contributing writers?
12 BY THE WITNESS:
13 A Yes.
14 BY THE COURT:
15 Q To put pieces of information on the website?
16 BY THE WITNESS:
17 A Yes.
18 BY THE COURT:
19 Q Is there a person in charge?
20 BY THE WITNESS:
21 A Arno.
22 BY THE COURT:
23 Q Okay. And is Arno the one who registered the website?
24 BY THE WITNESS:
25 A That was all there before I --

1 BY THE COURT:
2 Q Okay.
3 BY THE WITNESS:
4 A -- came to the organization.
5 BY THE COURT:
6 Q Okay. All right. Thanks.
7 BY MR. GROTHOUSE:
8 Q And, Mr. Rangel, these same people, to your knowledge, were
9 they involved in the Wisconsin entity?
10 A In the Wisconsin entity? Yes.
11 Q And were these same people the ones that then thereafter
12 worked at the Life After Hate non-profit Illinois organization?
13 A Yes.
14 Q Thank you.
15 Mr. Rangel, can you please discuss your roles and
16 titles at the Life After Hate Illinois non-profit organization?
17 A Sure.
18 Up until most recently, I was only a board member of
19 Life After Hate from 2010 to 2017.
20 And then in 20 -- April of 2017, I became the
21 executive director for Life After Hate and remained so.
22 Q Can you tell me what type of services Life After Hate, Inc.
23 offers?
24 A Sure.
25 There's certainly consulting with communities,

1 governmental organizations, non-governmental organizations,
2 universities, researchers, education, when we speak to
3 populations of schools or colleges, universities, communities.
4 Then through our ExitUSA program, we started doing
5 outreach and supportive services for men and women who were
6 considering or looking for a way out of their hate group
7 lifestyles.
8 And then we've seen an increase in providing support
9 for families or significant others of those same people that
10 are in those hate groups.
11 In general, that's more or less what we've been doing.
12 A lot of community presentations, things of those -- things of
13 that nature.
14 Q Can you tell me the -- any media that Life After Hate
15 organization has been referenced or interviewed or involved in?
16 A Sure.
17 We've -- we've been in like all the big names, you
18 know, CNN, you know, those types of news interview stations,
19 NBC, CNBC. We've been in the Chicago papers, New York papers,
20 West Coast papers, podcasts, big, you know, the -- the big
21 radio interviews, the small radio interviews. It's -- it's
22 many. It's maybe thousands at this point over the course of
23 our life.
24 BY THE COURT:
25 Q Who is "we"?

1 BY THE WITNESS:
2 A Life after -- Life After -- I'm speaking of Life After Hate
3 and any of the members of Life After Hate. All of us have been
4 interviewed at some point throughout the history.
5 THE COURT: Okay. Now I'm going to ask a question of
6 the lawyers.
7 So it's my understanding that Mr. -- how do you say
8 his name? Picciolini?
9 MR. GEEKIE: Soft C, your Honor. Picciolini.
10 THE COURT: Picciolini was part of Life After Hate at
11 some point. Right?
12 MR. GROTHOUSE: Correct, your Honor.
13 THE COURT: Okay. And so it's really critical for me
14 in an infringement case like this to understand when there's a
15 break and when someone is part of the entity and who we're
16 talking about when we're talking about the entity, especially
17 as it morphs and evolves over time, so try to be specific. And
18 I will sustain objections for foundation if you want to object.
19 But I need to know.
20 MR. GROTHOUSE: Yes, your Honor.
21 So as Mr. Rangel testified previously, Mr. Picciolini
22 was involved in the organization or group prior to the
23 formation of Life After Hate, and he was one of the cofounders
24 to the Illinois non-profit Life After Hate --
25 THE COURT: Okay. Well, I don't mind you directing

1 him now and getting it factually out so that I can find it.
2 But just when you have any time where you're saying "we" or
3 "it," there's -- there's "Life After Hate," there's "ExitUSA,"
4 there's also different forms of "Life After Hate" -- as you
5 know, otherwise, we wouldn't be here -- so be very specific
6 with who was the force behind it, okay?

7 MR. GROTHOUSE: Very well, your Honor. Thank you.

8 THE COURT: Thank you.

9 BY MR. GROTHOUSE:

10 Q So, Mr. Rangel, can you please tell me the media
11 appearances that Life After Hate, the organization, has
12 participated in or been involved in?

13 A CNN. NBC. CNBC. All of those, like, nighttime shows.
14 Newspapers of all the big medias that you would expect to read,
15 you know, national news on. National podcasts. National radio
16 interviews. Documentaries. And, of course, all over social
17 media on all the various platforms out there.

18 THE COURT: Okay. You have to be specific now. Who
19 are those individuals being interviewed on all those things?

20 MR. GROTHOUSE: Sure.

21 BY MR. GROTHOUSE:

22 Q So can you talk about your own interviews, for example?

23 A Sure.

24 Over the -- over the course of years, I've done random
25 interviews for the organization on any of those platforms. I'm

1 I remember seeing some emails coming from, I believe,
2 Tony and Angela, Christian may have been in on there, where
3 Tony was coming back from Europe and had had some meetings with
4 some key stakeholders in Europe concerning developing or
5 creating an ExitUS -- or an Exit model program in the U.S.
6 based on the European models that we knew existed. And so we
7 were really excited about that. And everyone decided, like,
8 that was the direction that we should go in.

9 And so I know that there was a number of efforts put
10 to move that concept forward.

11 I remember when Gravity Tank got involved, which was
12 helping us create like -- like the imaging, the colors, the
13 phrasing, the images that we would be using, the symbols that
14 could represent different things.

15 And then in early 2015, me, Tony, Christian, and
16 Frankie flew into Las Vegas to kind of talk about and finalize
17 what versions of all of that product we would use as our
18 program.

19 Q And what kind of services did Life After Hate, Inc., the
20 Illinois non-profit, provide under the US -- the ExitUSA
21 program?

22 A Sure.

23 It would have been outreach. And that outreach can be
24 remote, so virtual, or it can be in person. It can be by
25 phone. Direct messaging. And, again, you know, trying to

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1 trying to think most recently. NBC. CNBC. Can't remember --
2 I'd have to look at my notes, but Angela recently did a TV --
3 pretty big TV interview. I believe it was like on CNN, if I'm
4 not mistaken. I've been in the *Milwaukee Journal*, the *New York*
5 *Times*, the -- some New York big paper I can't remember off the
6 top of my head right now. Hundreds of radio interviews.
7 Hundreds of podcasts at this point.

8 Q And during these interviews, you talk about your role in
9 Life After Hate, correct?

10 A Sure.

11 When I was a board member --

12 MR. GEEKIE: Can you please speak up?

13 BY THE WITNESS:

14 A What? When I was a board member, I would always reference
15 Life After Hate, even when I was doing my own personal
16 presentations, before really playing the role I'm doing now,
17 would talk about Life After Hate. So, yeah, it was always
18 talking about Life After Hate, trying to help that
19 organization.

20 BY MR. GROTHOUSE:

21 Q Let me direct your attention to the year of 2014.

22 Can you speak to your knowledge of the development of
23 Life After Hate's, the Illinois organization's, ExitUSA
24 program?

25 A Sure.

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1 market the program, so a lot of marketing on social media to
2 kind of let people know we exist. Use that as a beacon to draw
3 those crowds in. There was a phone line that was used for
4 people to be able to call, leave messages so that we could
5 respond back to those. Those would be -- and just a lot of
6 supportive services, a lot of supportive listening, trying to
7 make the right referrals, get them engaged in the right
8 communities.

9 And then they would eventually, after establishing
10 some trust, come into what we would refer to as secret groups.
11 These were groups that you had to be let in by invitation only,
12 so you couldn't just Google it and find it. They were private.
13 They would come into those groups for ongoing support.

14 Q And when did Life After Hate, Inc., the Illinois
15 non-profit, start to provide these services under the ExitUSA
16 mark?

17 A 2015, under the ExitUSA mark.

18 Q Thank you.

19 And where did you -- did Life After Hate, the Illinois
20 non-profit, provide these services under the Life -- under the
21 ExitUSA mark?

22 A Our model -- our organization is a virtual model. And so
23 our team lives dispersed across the states. Some of them live
24 in other countries, outside of the country. But we would --
25 wherever the needs were, we would typically, if a face-to-face

1 interview was necessary, we would go to wherever that person
 2 was in the country. So Buffalo, New York, Michigan, places
 3 like that. Otherwise, a lot of that happened remotely through,
 4 you know, technology and platforms.
 5 Q How many states have you provided services in? How many
 6 states has Life After Hate, Inc., the Illinois non-profit,
 7 provided ExitUSA services, in your estimation?
 8 A In any capacity?
 9 Q Yes.
 10 A I'm trying to remember the latest report that we generated.
 11 I think it's -- if I had to estimate, it would be about 30
 12 different states, if not more.
 13 Q Okay. Thank you.
 14 Let me direct your attention to Mr. Piccolini.
 15 Can you talk about some of the issues that the
 16 Illinois non-profit Life After Hate organization had with
 17 Mr. Piccolini starting in 2016?
 18 MR. GEEKIE: Objection. Form, your Honor.
 19 THE COURT: It's sustained. It's overly broad. It's
 20 vague. It's foundation. You've got to be much more specific.
 21 MR. GROTHOUSE: Very well, your Honor.
 22 BY MR. GROTHOUSE:
 23 Q Mr. Rangel, can you tell me Mr. Piccolini's role in Life
 24 After Hate, the non-profit organization?
 25 A He had various roles throughout his time with us. There

1 were times when he was a board member. There were times when
 2 he was the executive director. Most recently, before our
 3 separation, he was the program director for ExitUSA.
 4 Q Thank you, Mr. Rangel.
 5 And can you tell me the first time that you had --
 6 that you or anybody in the organization had any trouble or
 7 conflict with Mr. Piccolini?
 8 A The first time I remember serious concerns arising were
 9 around 2016. There were two -- two or three separate
 10 instances, all around the same time. One was concerning the
 11 fact that he was doing outreach, and the organization was
 12 unaware of his activities. Out of that came concern that he
 13 was meeting with -- that there was one that became quite -- was
 14 trying to become a public, like a situation by an underage
 15 female accusing Christian of inappropriate behavior during his
 16 outreach with her. And then Christian --
 17 MR. GEEKIE: I'll object. There's no relevance to
 18 this. In fact, it's an attempt to smear Mr. Piccolini. And
 19 there's -- there's no foundation that this relates to some kind
 20 of infringement or the injunction here --
 21 THE COURT: Okay. Sustained as far as relevance is
 22 concerned. To the extent that there was some break or
 23 severance, we certainly can refer to it in generalities, but --
 24 I don't need to have a collateral trial on some other issues,
 25 okay?

1 So go ahead.
 2 BY MR. GROTHOUSE:
 3 Q Okay. Mr. Rangel, can you please tell me what events led
 4 to the resignation of Mr. Piccolini from the Life After Hate
 5 board, the Illinois non-profit organization Life After Hate's
 6 board?
 7 A Sure.
 8 Can you -- can you repeat the question?
 9 Q Sure.
 10 Can you tell me the events that led up to
 11 Mr. Piccolini's resignation from Life After Hate's board?
 12 A Sure.
 13 There were -- the most concerning events that led up
 14 to that were concerns about this administration having issue
 15 with the way some of Christian's tweets were -- the way he was
 16 tweeting about this administration became a political issue
 17 with this administration, started naming us by name,
 18 criticizing spending for that.
 19 And then, of course, the other behaviors I mentioned
 20 were all on our minds when we were thinking about how to move
 21 forward.
 22 And even Christian himself thought it would be a good
 23 idea to remove himself from that position in light of the
 24 political tensions that were growing with our non-profit and
 25 this administration.

1 Q When you say "this administration," to what are you
 2 referring to?
 3 A The Trump administration.
 4 So there were some, from a non-profit's perspective,
 5 inappropriate tweets that put bad light on us about this --
 6 about Chris' personal feelings about the president.
 7 MR. GEEKIE: Objection again, your Honor, to
 8 relevance.
 9 We'll stipulate that Mr. Piccolini left the
 10 organization in August of 2017 due to conflicts with the other
 11 executives and managers at the business.
 12 But, again, they're trying to cast a political shadow
 13 and they're trying to impugn Mr. Piccolini, which has nothing
 14 to do with his alleged infringement after leaving.
 15 THE COURT: Okay. So --
 16 MR. GEEKIE: The issue here is after he left.
 17 THE COURT: I need to have some context of what the
 18 break was, though.
 19 So, I mean, really, the question should be what was
 20 the reason?
 21 I can't quite tell from the answers whether he was
 22 asked to leave or whether he volunteered to leave, whether
 23 there was a discussion and everyone agreed he should leave, and
 24 then what was the reason for reaching that point.
 25 That's a pretty helpful and relevant question to ask,

1 and I haven't gotten the answers yet.
2 So overruled to the extent that I need those answers,
3 and sustained to the extent that I'm not on a collateral review
4 of some personal fight. Okay?
5 MR. GROTHOUSE: Yes, your Honor.
6 BY MR. GROTHOUSE:
7 Q So what -- what year did Mr. Picciolini resign from the
8 board?
9 A April 2017.
10 Q And that was a decision by the board. Correct?
11 A Yes. And -- and by Christian as well.
12 Q So Mr. Picciolini agreed to resign from the board.
13 A Yes.
14 Q After Mr. Picciolini resigned from the board, what was his
15 role in the organization?
16 A He was given the title program director for ExitUSA, which
17 was to report directly to me.
18 Q So before Mr. Picciolini resigned from the board, was he
19 program director of ExitUSA?
20 A No. That title never existed before.
21 Q So he was appointed to that title upon his resignation?
22 A Yes.
23 Q In April of 2017 you said.
24 A Correct.
25 Q And after he was appointed to this role, what did he do for

1 of 2017 with Life After Hate, the Illinois non-profit?
2 A I was --
3 COURT REPORTER: Repeat that.
4 BY THE WITNESS:
5 A I was and am the executive director of Life After Hate.
6 BY MR. GROTHOUSE:
7 Q Let me direct your attention to August of 2017.
8 Can you talk about what originally happened -- can you
9 talk about what happened in August of 2017? What was going on
10 at Life After Hate, the organization?
11 A In reference to Christian? Or just --
12 Q Correct.
13 A -- in general?
14 So in reference to Christian, we were having great
15 difficulty managing Christian.
16 At this point, Christian was demanding all of our
17 resignations, demanding that we hand over all the -- all of the
18 assets of the organization to him.
19 What eventually led to the day that I suspended
20 Christian was two-fold.
21 He had at this point for the third or fourth time
22 violated privacy and confidentiality of people he had provided
23 services to. This was an extremely vulnerable case that he had
24 done that, where he posted something on social media revealing
25 his part in helping someone from -- who had received services

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1 the organization?
2 A He was supposed to be maintaining the caseload that he was
3 working through. He was supposed to be staffing those cases
4 with me. And then there were policy and procedures that were
5 implemented that were ratified at the board that he was
6 supposed to be implementing in this program to help shapen and
7 conduct the program in a certain manner. And that was supposed
8 to be his main role, was to managing that Exit program,
9 managing the caseload that existed there, and then staffing
10 those cases with me.
11 Q And you said that you were supposed to be supervising him.
12 A Correct.
13 Q What was your role as supervisor? What did you do?
14 A I needed to see the caseload, first of all. I needed to --
15 we were supposed to be talking about those individuals,
16 staffing those individual cases to kind of understand, know
17 what was happening, give direction if any was needed or was
18 appropriate, and then maybe help determine a plan of action or
19 course of action that needed to be done. And then, of course,
20 another part of my role was ensuring the adherence to policy
21 and procedure, ensuring to transparency, accountability, all
22 those appropriate things of running a program in a non-profit
23 organization.
24 Q Thank you, Mr. Rangel.
25 What was your title or -- at the time -- after April

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1 under Life After Hate.
2 MR. GEEKIE: Objection again, your Honor.
3 THE COURT: No, that one is important if that was his
4 reason for doing -- for separating him. So overruled.
5 You can, of course, cross-examine him about what that
6 was.
7 THE WITNESS: Sure.
8 THE COURT: Go ahead.
9 THE WITNESS: Should I keep going?
10 THE COURT: You may.
11 MR. GROTHOUSE: Yes.
12 BY THE WITNESS:
13 A I had asked him -- I already knew the answer, but I wanted
14 clarification from him, was this -- is this post on your page
15 about somebody who received services under Life After Hate?
16 He said yes.
17 You need to take that -- I told him -- instructed him,
18 you need to take that down and asked him to consider how that
19 victim would feel if she were to find out that we were boasting
20 or bragging about this on social media.
21 We had also come to a breaking point of asking him for
22 all of the log-in and user name information for all of our
23 different platforms and accounts that we had that he had taken
24 possession of and was not -- he was not, over several months,
25 was not complying with that instruction.

1 He became aggressive, argumentative, threatening in
2 his tone with me through email while I was trying to address
3 these matters.

4 And by this point, we had had months of this kind of
5 behavior.

6 And I let him know at that point, I was, like,
7 Christian, until further notice, you are suspended from Life
8 After Hate.

9 You're -- and -- so I suspended him I believe on the
10 24th of August from Life After Hate.

11 BY MR. GROTHOUSE:

12 Q Mr. Rangel, let me direct your attention to what is marked
13 as LAH Exhibit 27 for identification purposes only.

14 (Tendered.)

15 BY MR. GROTHOUSE:

16 Q Can you please tell me what document that is?

17 MR. GEEKIE: Your Honor, could we get -- get these up
18 on the screen?

19 THE COURT: Oh, absolutely. You can use the document
20 overhead -- do you have them on the computer?

21 MS. SAPER: We have another exhibit.

22 MR. GROTHOUSE: If we can, that would be nice.

23 THE COURT: If you can put it on -- if you can put it
24 on the computer, that's simple. We can connect it.

25 If you can't, you can use the document camera.

1 Either way, it will get on the screen, so whichever
2 one you prefer.

3 MR. GROTHOUSE: Let's try to connect it.

4 THE COURT: Okay. So there's a connection cord right
5 over here on the evidence cart. Right there. And you just
6 look for either VGA or HDMI. And then you just tell me which
7 one it's labeled.

8 MR. MONACO: It's plugged into the HDMI.

9 THE COURT: Okay. Let me see if I can get it for you.
10 There you go. Do you have it, gentlemen?

11 MR. GEEKIE: Yes, we do, Judge. Thank you.

12 THE COURT: Okay. And then there is a way to make
13 it -- you know what? I can even help you with that.

14 Oh, you got it. There you go.

15 Thank you. All set?

16 MR. GROTHOUSE: Yes.

17 BY MR. GROTHOUSE:

18 Q Mr. Rangel, can you identify what this exhibit is?

19 A These are messages back and forth between me and Christian
20 on the day that I suspended him.

21 Q What kind of platform were these messages --

22 A I think this is text messaging which I had to resort to
23 because I had suspended his email account at this point.

24 Q And you said they were between Mr. -- between you and who?

25 A And Christian Picciolini.

1 Q And what was the date of these text messages?

2 A I believe it's August 23rd.

3 Q And during these texting conversations, can you tell me
4 what exactly you said to Mr. Picciolini?

5 A More or less letting him know I was suspending him.

6 There was some other behavior that was concerning
7 right preceding this where he had went into the secret support
8 group of our -- of the people that we've helped serve through
9 ExitUSA and Life After Hate. This is a -- this would be the
10 equivalent of our clients or our vulnerable population space.
11 And he went in there and gave -- he -- a rant about what was
12 happening to him and this organization, which was completely
13 inappropriate and violated any type of practice of doing this
14 work in working with clients.

15 And so that was our vulnerable population I needed
16 to protect them, so I had him removed -- or I warned him to
17 stop his behavior, because I had the post removed. And when he
18 didn't stop, then I had him removed from the group for
19 continuing that behavior in that group.

20 And then I sent him these messages letting him know
21 that he was suspended until further notice.

22 And he more or less was saying -- he was ranting more
23 or less back. And I could certainly understand him being
24 angry, but I needed him to understand, you're not to operate on
25 our behalf at this point. You need to stop interacting with

1 these men and women. With our group, you're not -- you're not
2 to do anything for us right now until further notice.

3 Q Thank you, Mr. Rangel.

4 MR. GROTHOUSE: Your Honor, at this time I would like
5 to admit LAH Exhibit Number 27 into evidence.

6 THE COURT: Okay. I take it you object.

7 MR. GEEKIE: No, your Honor. But I'm confused by
8 Mr. Rangel's testimony here.

9 Where he just testified, I don't know if he was
10 testifying about the document?

11 He was testifying generally about some things he said,
12 but he has never pointed out in this document where he said
13 this.

14 So I think -- there's a foundational problem here
15 because he says these are documents --

16 THE COURT: Okay, guess what? The simple objection is
17 just foundation.

18 MR. GEEKIE: Okay.

19 THE COURT: So with the admissibility for the document
20 is he has to authenticate the communication.

21 MR. GROTHOUSE: Sure, your Honor.

22 THE COURT: Sustained.

23 BY MR. GROTHOUSE:

24 Q Mr. Rangel, can you please direct the Court's attention to
25 the text message exchange where you mention or you refer to

1 where you suspend Mr. Picciolini?
 2 A So it looks like it's the very first entry.
 3 Q Can you just read your message?
 4 A Yeah. My message says: Consider yourself suspended until
 5 further notice based on your current behavior.
 6 And then he -- he responds.
 7 And then I go on to say: I understand why you're
 8 saying and behaving this way, but it is unacceptable. And you
 9 are suspended immediately pending further notice. The group
 10 will be notified of that decision posthaste. How you carry
 11 yourself from this point forward will determine what we say and
 12 how we proceed with you.
 13 And then he responds again.
 14 Q That's fine.
 15 A That's more or less the intent of that message.
 16 Q Thank you, Mr. Rangel.
 17 MR. GROTHOUSE: Your Honor, at this time I would like
 18 to introduce -- admit Number 27 into evidence.
 19 THE COURT: Okay. So the issue is whether that is him
 20 communicating, and does he recognize those text messages as
 21 his, and is that his phone number, and is that the phone number
 22 of the other person.
 23 MR. GROTHOUSE: I'm sorry, your Honor. I thought I
 24 established it from the beginning. My apologies.
 25 THE COURT: Okay.

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1 MR. GEEKIE: Your Honor, we won't object.
 2 THE COURT: Okay.
 3 MR. GEEKIE: We'll stipulate to the --
 4 THE COURT: All right. It will be admitted.
 5 (Said exhibit received in evidence.)
 6 BY MR. GROTHOUSE:
 7 Q Proceeding on, Mr. Rangel.
 8 I'm going to hand you what is marked as LAH Exhibit
 9 Number 28 for identification purposes.
 10 (Tendered.)
 11 BY MR. GROTHOUSE:
 12 Q Can you please identify what this document is --
 13 represents?
 14 A This looks like a series of emails leading up to
 15 Christian's termination from the organization.
 16 Q Mr. Rangel, is Sammy@LifeAfterHate.org your email?
 17 A Yes.
 18 Q And is Christian@ChristianPicciolini.com Mr. -- defendant
 19 Picciolini's email?
 20 A One of several.
 21 Q And do these -- does this email exchange fairly and
 22 accurately represent the exchange that you had with
 23 Mr. Picciolini via email on this August 23rd and 24th days?
 24 A Yes.
 25 Q And --

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1 MR. GEEKIE: Your Honor, we'll stipulate to its
 2 admissibility --
 3 THE COURT: Okay.
 4 BY MR. GROTHOUSE:
 5 Q Mr. Rangel, as a quick summary, before we get into the
 6 actual content of the emails, can you briefly describe the
 7 conversation that you had with Mr. Picciolini?
 8 A So we -- I think this was follow-up to his suspension and
 9 what action we were going to be taking moving forward. I'm
 10 addressing specific behaviors that are complicating this issue.
 11 And then eventually at the -- at the end result of this, I
 12 couldn't -- I was trying to appease Christian by trying to come
 13 up with an answer, but Chris -- Tony, who was the board
 14 president who I was waiting to hear more from, was
 15 hospitalized, and so I let Christian know there's going to be a
 16 delay. And then as he pushed the issue, I said, well, then
 17 there's nothing else to talk about, Christian.
 18 Q Let me direct your attention, Mr. Rangel, to the email -- I
 19 believe it's the last email in the chain. There's August 24,
 20 2017. Sent at 9:03 p.m.
 21 A I see it.
 22 Q Can you please verify that this is the email that you sent
 23 to Mr. Picciolini?
 24 A It is.
 25 Q And can you tell me -- can you read to me what that email

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1 says?
 2 A In totality or in -- in --
 3 Q In pertinent part, yes.
 4 A Okay. I let him know Tony was in the hospital.
 5 I said: However, the board met today, read through
 6 your emails, Facebook posts, concerns, comments, as well as
 7 other evidence I presented concerning your conduct through the
 8 organization with media communications, allegations, and
 9 demands. The board has moved forward with my recommendation to
 10 terminate any relationship with you and has approved your
 11 termination from any dealings with Life After Hate. The only
 12 issue is how we strategically move forward with you publicly at
 13 this point.
 14 Q So Life After Hate, the Illinois non-profit, terminated
 15 Mr. Picciolini from the organization.
 16 A Yes.
 17 Q Thank you, Mr. Rangel.
 18 MR. GROTHOUSE: Your Honor, at this time I would like
 19 to introduce -- excuse me, admit Exhibit LAH Exhibit marked 28
 20 into evidence.
 21 THE COURT: Okay. It will be admitted.
 22 (Said exhibit received in evidence.)
 23 BY MR. GROTHOUSE:
 24 Q Mr. Rangel, I'd like to now direct your attention to LAH
 25 Exhibit 8, marked for identification purposes.

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1 Can you please identify what this exhibit is?

2 A It looks like an email from Christian trying to negotiate

3 how -- how to terminate our relationship.

4 MR. GEEKIE: Judge, could I ask for a pause? The --

5 THE COURT: It's just a little -- if you go to the

6 corner, I think it's the lower right-hand corner, you can clear

7 it.

8 MR. GROTHOUSE: I'll just reopen it.

9 THE COURT: No, it's on the screen.

10 MR. GROTHOUSE: Oh, I see.

11 THE COURT: Yes. So there's a "Clear" button in the

12 lower right-hand corner of the screen, I think.

13 (Pause in proceedings.)

14 THE COURT: I'll tell you what. We'll take a short

15 break right now and you can figure that out, all right?

16 I'll be back in 10, 15 minutes, okay?

17 MR. GEEKIE: Could I ask a housekeeping matter?

18 THE COURT: Sure.

19 MR. GEEKIE: We haven't discussed how long you'll give

20 us today or what you anticipate the time frame being.

21 THE COURT: I have a 3:00 o'clock -- a phone

22 conference for the Civil Jury Instruction Committee, so I can

23 go until 3:00 today. Okay?

24 MR. GEEKIE: Okay. Thank you.

25 THE COURT: All right.

1 LAW CLERK: All rise. Court is in recess.

2 (Recess taken from 12:39 p.m. to 12:54 p.m.)

3 (Proceedings heard in open court:)

4 THE COURT: Sir, go ahead and take the stand again.

5 (Witness resumes the stand.)

6 THE COURT: And you're still under oath.

7 Did we find out how to clear the screen?

8 MR. GROTHOUSE: We did.

9 THE COURT: Okay. Is it the right-hand side? Lower

10 right? Or was it --

11 MR. GROTHOUSE: It's actually like middle right-hand

12 side.

13 THE COURT: Okay. Just so I know.

14 MR. GROTHOUSE: It's a button that says "Clear."

15 THE COURT: Okay. Next time I will say that to the

16 person over there.

17 You can proceed.

18 BY MR. GROTHOUSE:

19 Q Mr. Rangel, I would like to direct your attention to LAH

20 Exhibit Number 8.

21 Can you please identify what this exhibit is?

22 A This appears to be an email from Christian trying to

23 negotiate how to separate.

24 Q And this is your email account -- excuse me.

25 SammyRangel109@gmail.com is your email account?

1 A That's my personal email account. I'm not sure why it was

2 sent to that one, but yes.

3 Q You had this email exchange with Mr. Picciolini on this

4 23rd of August --

5 A Yes.

6 Q -- 2017?

7 A Yes.

8 Q Let me direct your attention -- direct your attention to

9 the first email sent from Mr. Picciolini.

10 Can you briefly describe the summary of the email?

11 A Yes. Christian is asking me to more or less give him

12 ExitUSA, also to give him \$50,000 of seed money for ExitUSA,

13 and under those conditions it would -- it would look like a

14 mutual separation. He refers that it -- if we don't do it, it

15 would confuse people. Impact our Life After Hate's

16 fundraising. More or less that's -- that's what he's asking me

17 to do.

18 Q Can you read the first four -- full paragraph where it

19 starts, "Here's what I suggest"?

20 A "Here's what I suggest. Spin off ExitUSA to me. I will

21 establish it as an entity separate from Life After Hate. Life

22 After Hate is the brand name and the one with the support of

23 the public. In the eyes of the public, this will appear to

24 make sense. I do the interventions, and they associate that

25 with me anyway. You guys can do great prevention and online

1 intervention work with the money you'll raise as the grant was

2 intended to do. Leave the physical interventions to ExitUSA.

3 I will build a team there and start from scratch. This will

4 make it seem like an amicable split and not you firing me or me

5 walking away. This will confuse people and raise questions" --

6 did you want me to stop?

7 Q And, Mr. Rangel, what was your ultimate response to this

8 email?

9 A I basically told him I was going to get back to him after I

10 spoke with the board.

11 Q And you did speak to the board?

12 A Yes.

13 Q And what was the response?

14 A The response was that if we agreed to these terms, we

15 couldn't trust Christian to abide by anything that he was

16 saying. We felt that it basically amounted to blackmail. And

17 we also felt that it wasn't a good idea to seem like we were

18 supporting this separation under the circumstances of the

19 separation.

20 Q And just to clarify, Mr. Rangel, did you object to

21 Mr. Picciolini leaving the organization, starting his own

22 organization with a different name, for example?

23 A It's a tough question for me to answer.

24 Once Christian left the organization, he -- we felt he

25 could do what he wanted. We couldn't control what he would do

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1 once we let him go.
 2 Q And would Life After Hate, the Illinois non-profit that you
 3 were an officer of at the time, would they agree to a joint
 4 statement? Would they have agreed to a joint statement, in
 5 your opinion --
 6 MR. GEEKIE: Objection. Form, your Honor.
 7 THE COURT: That's sustained.
 8 You can try a different form.
 9 MR. GROTHOUSE: Sure, your Honor.
 10 BY MR. GROTHOUSE:
 11 Q Mr. Rangel, this email, as you read out, suggested that
 12 Mr. Piccolini disassociate or spin off ExitUSA program and
 13 then form a -- and then issue a joint statement declaring this
 14 spin-off, and you mentioned that you were not going to -- that
 15 the organization did not agree to that.
 16 Would you have agreed to a joint statement under other
 17 conditions?
 18 MR. GEEKIE: Objection. Form, your Honor.
 19 BY THE WITNESS:
 20 A Yes.
 21 THE COURT: Well, to the extent that it's speculation,
 22 is that what you're saying?
 23 MR. GEEKIE: Yes, your Honor.
 24 THE COURT: Right. So, here, I think that is a
 25 speculative question. But if there were discussions or other

1 Q Okay. I would like to now ask you, Mr. Rangel, once
 2 Mr. Piccolini was terminated from the organization, I believe
 3 it was August of 2017, can you tell me what happened after
 4 that?
 5 A Well, I believe by that night, I was getting messages from
 6 formers. One was a screenshot of Christian having created a
 7 signature called ExitUS.
 8 MR. GEEKIE: Objection. Hearsay, your Honor.
 9 THE COURT: Okay. So let me just -- hold on, hold on.
 10 Okay. So it's what -- can you tell me what happened
 11 after that, and the answer is receiving messages.
 12 So it might not be hearsay if it is in explaining how
 13 he acted to receive them, but I don't really know what these
 14 messages are.
 15 MR. GEEKIE: I understand, Judge. I was just trying
 16 to get ahead before it came out.
 17 THE COURT: Understood. Okay. So to the extent --
 18 you know what you're about to elicit --
 19 MR. GROTHOUSE: Yes.
 20 THE COURT: -- so if it is to explain how he acted at
 21 that time --
 22 MR. GROTHOUSE: Yes.
 23 THE COURT: -- as opposed to for the truth of the
 24 matter asserted, then I will sus -- overrule the objection.
 25 Excuse me.

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1 negotiations regarding other alternatives, you can ask that.
 2 MR. GROTHOUSE: Sure, your Honor.
 3 BY MR. GROTHOUSE:
 4 Q Mr. Rangel, when you were discussing this -- the demand by
 5 Mr. Piccolini with the board, can you tell me your issues with
 6 his demand, the board's issues with that demand?
 7 A I think what I mentioned was ExitUSA was a major
 8 significant part of Life After Hate, associated with us, our
 9 identity. We weren't going to pay him \$50,000 under the
 10 circumstances. And we didn't trust that he would at this point
 11 keep his word with any of the agreements. And so we -- we
 12 refused -- we refused this demand.
 13 Q During this discussion that you had with the rest of the
 14 board, did the board object to the specific idea of issuing a
 15 joint statement just saying Christian was leaving amicably?
 16 A No.
 17 Q So you did not object to that part of his proposal.
 18 A No.
 19 Q Okay. Thank you.
 20 MR. GROTHOUSE: Your Honor, at this time I'd like to
 21 introduce LAH Exhibit Number 8 into evidence.
 22 MR. GEEKIE: No objection, your Honor.
 23 THE COURT: Okay. It will be admitted.
 24 (Said exhibit received in evidence.)
 25 BY MR. GROTHOUSE:

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1 Go ahead.
 2 BY MR. GROTHOUSE:
 3 Q Proceed, Mr. Rangel.
 4 A I received screenshots of Christian having started another
 5 secret group called ExitUS. The logo was essentially the same
 6 except he changed the color and dropped the "A." And the
 7 complaint that we were receiving was that he was adding people
 8 to this support group without their consent.
 9 MR. GEEKIE: Objection. Hearsay, your Honor.
 10 THE COURT: I'm sorry?
 11 MR. GEEKIE: This is all hearsay.
 12 THE COURT: Okay. But if that's the reason that he
 13 did something as a result of it, then it's not -- we don't --
 14 we're not saying that it actually happened. We're saying
 15 because I received this complaint, I acted in this way. So
 16 it's not hearsay.
 17 MR. GEEKIE: There hasn't been a question yet, your
 18 Honor, about what he did. It's all about what he --
 19 THE COURT: Well, that was the original -- okay, but
 20 the original one was what had happened after that.
 21 So how did you react?
 22 BY MR. GROTHOUSE:
 23 Q Mr. Rangel, as a result of these messages, what did Life
 24 After Hate do?
 25 A I think we consulted with each other. We had to start

1 trying to explain ourselves again in the support group, which
 2 was creating a lot of chaos for members, paranoia for the
 3 members. Anger, confusion. And we were really stuck between a
 4 rock and a hard place because we felt we couldn't disclose the
 5 true nature of what was happening. We just kept trying to say
 6 we're trying to deal with this, we're sorry. We lost members.
 7 It was -- that was just one of the things that happened.
 8 Q About the trademarks in particular, what did Life After
 9 Hate do?
 10 A Well, we started -- after the termination, we realized that
 11 we didn't control the ExitUSA domain anymore. And so we
 12 started scrambling, looking through our history of passwords,
 13 hoping that the password was somewhere in some of our
 14 documents. I asked Tony to start investigating ways that we
 15 could access -- you know, reclaim ownership of these. We felt
 16 we had -- that we could go to these agencies or companies to
 17 explain our position. That lasted for -- for months, trying to
 18 recover that loss of those platforms.
 19 Q So what happened to the ExitUSA.org domain name?
 20 A Initially, we couldn't do anything with it. To us, it was
 21 dead in the water. We didn't know how to access it. And we --
 22 we -- we had to create kind of like a landing page to explain
 23 that. Like, hey, we're working on this.
 24 We then soon found out that it was being redirected to
 25 ChristianPicciolini.com/ExitUSA. That sent us -- you know,

1 just -- we renewed our efforts to try to figure out what we
 2 could do about this. We were concerned about making it a
 3 public matter, so we stayed quiet. Tried to do that
 4 internally. You know, Tony emailing Facebook, YouTube, whoever
 5 we could, to ask for help.
 6 Q So to clarify, if a user went on to -- typed in
 7 www.ExitUSA.org, what would happen?
 8 MR. GEEKIE: Objection. Foundation.
 9 BY THE WITNESS:
 10 A They would land on Christian's page.
 11 THE COURT: Okay. That's overruled. He can do it.
 12 BY THE WITNESS:
 13 A It would go directly to ChristianPicciolini.com page, not
 14 a -- not an organization, but to his personal page.
 15 BY MR. GROTHOUSE:
 16 Q What was on that page?
 17 A Well, there was -- it's changed over time. But, you know,
 18 a picture of Christian, his books. There was ExitUSA. Our
 19 logos. Our phrases. The exact ones.
 20 And then eventually we -- we found out that our PSA
 21 had been altered.
 22 It was just -- it was just, like, parts of our website
 23 and stuff were on his home page.
 24 Q Okay. And what about the ExitUSA YouTube account?
 25 MR. GEEKIE: Objection. Form, your Honor.

1 THE COURT: Excuse me? Vague?
 2 MR. GEEKIE: Objection. Form.
 3 THE COURT: Yes, sustained.
 4 BY MR. GROTHOUSE:
 5 Q Mr. Rangel, the -- Life After Hate, the Illinois
 6 non-profit, used and owned a YouTube account. Can you tell me
 7 what that account was?
 8 A We had, I believe, a Life After Hate and an ExitUSA YouTube
 9 page. Separate pages.
 10 Q What was the ExitUSA YouTube page called?
 11 A What was it called?
 12 Q What was the name of the page?
 13 A I'd have to look at my documents to know for sure, but I
 14 believe it was called ExitUSA.
 15 Q And what did -- what did Life After Hate, the Illinois
 16 non-profit, include or put on that page?
 17 A We had four videos for sure on that page that were kind of
 18 outreach videos, PSA announcements, public service
 19 announcements, trying to reach out to men and women who were
 20 vulnerable and potentially looking for a way out of these hate
 21 groups. That was -- those were the main -- that was the main
 22 holding space for those types of PSA announcements.
 23 Q After Mr. Picciolini was terminated from the organization,
 24 what did the YouTube page -- was Life After Hate able to
 25 control that YouTube page?

1 A No. We discovered that we could not control that page
 2 either.
 3 Q Thank you, Mr. Rangel.
 4 Mr. Rangel, in September of 2017, can you tell me what
 5 Life After Hate did, any action that they took, in connection
 6 with its ExitUSA and Life After Hate trademarks?
 7 A We filed -- I believe we started to file for the trademarks
 8 for both Life After Hate and ExitUSA.
 9 Q Did you retain -- did Life After Hate, Illinois non-profit,
 10 retain counsel to do so?
 11 A We did. We retained counsel to help us through that
 12 process.
 13 Q And after you submitted these applications, did you -- did
 14 Life After Hate reach out to Mr. Picciolini any time after
 15 that?
 16 A Yes. We did, through our counsel who issued a cease and
 17 desist letter to Mr. Picciolini.
 18 Q And what was the result of that cease and desist letter?
 19 MR. GEEKIE: Objection. Form.
 20 THE COURT: What was the result? No.
 21 You can answer that.
 22 BY THE WITNESS:
 23 A I believe, rather than acknowledge or take responsibility
 24 for that, he doubled down his efforts and told us to cease and
 25 desist. Basically said we were stealing it from him.

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1 BY MR. GROTHOUSE:
 2 Q And after the letter was sent, what happened to the Life
 3 After Hate trademark applications, the Illinois non-profit's
 4 trademark applications?
 5 A Ours went through. We were successful at getting those
 6 trademarks.
 7 Q And around the same time, did Mr. Picciolini apply for or
 8 submit any trademark applications?
 9 A We did find out that he was also trying to apply for those
 10 trademarks after -- after we had.
 11 Q And what was -- what was -- what was he trying to apply
 12 for?
 13 A I believe that the response from the issuers were that
 14 he --
 15 MR. GEEKIE: Objection. Foundation and hearsay, your
 16 Honor.
 17 THE COURT: That's sustained.
 18 BY MR. GROTHOUSE:
 19 Q What --
 20 MR. GEEKIE: Excuse me. Mr. Grothouse, can you speak
 21 up a little? We're having trouble hearing you.
 22 MR. GROTHOUSE: Sure.
 23 COURT REPORTER: Judge, would you ask Mr. Geekie to
 24 please use his microphone?
 25 THE COURT: Oh, can you use the microphone, too, when

1 Q Mr. Rangel, the specific question was: Were you, as a
 2 member of Life After Hate, the Illinois non-profit, aware of
 3 any trademark application submitted to the USPTO by
 4 Mr. Picciolini?
 5 A I was made aware of that, yes.
 6 Q Can you tell me what application you're aware of?
 7 A I believe he put in the trademarks for ExitUSA and --
 8 ExitUSA, I believe.
 9 Q Can you -- do you -- can you tell me, based on your
 10 knowledge of that process, what happened to Mr. Picciolini's
 11 trademark application?
 12 A It was denied.
 13 MR. GEEKIE: Objection. Foundation, your Honor.
 14 THE COURT: Okay. As far as his knowledge, right?
 15 MR. GEEKIE: Well, that's the question, your Honor,
 16 but no foundation has been laid that he -- that he reviewed the
 17 documents, that he knows anything about the documents. He said
 18 he consulted counsel.
 19 THE COURT: Okay. I'll sustain the objection for
 20 foundation.
 21 If you can lay it, you can.
 22 MR. GROTHOUSE: Sure.
 23 BY MR. GROTHOUSE:
 24 Q Mr. Rangel, the USPTO has an online database. You're aware
 25 of that, correct?

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1 you object for her, because she's using headphones and that
 2 will make -- there's one on your table. You can put it towards
 3 you. Yes, thanks.
 4 MR. GEEKIE: I apologize.
 5 BY MR. GROTHOUSE:
 6 Q Mr. Rangel, the specific question --
 7 THE COURT: Does it move? Hang on a second.
 8 BY MR. GROTHOUSE:
 9 Q Were you aware of any application, trademark
 10 applications --
 11 THE COURT: I just said hold on a second.
 12 MR. GROTHOUSE: Oh, I'm sorry.
 13 THE COURT: I don't think you can move it, right? I
 14 don't want you to mess up everything they set up there.
 15 I'll have to remember that for where the attorney sits
 16 next time, to the extent that you either can speak towards
 17 it -- oh, maybe the one behind you.
 18 MR. GEEKIE: Good idea, Judge.
 19 THE COURT: There you go. But don't trip on it when
 20 you stand.
 21 MR. GEEKIE: There's a lot of wires back here.
 22 THE COURT: Okay. There you go. Thank you.
 23 All right. Let's start up again.
 24 MR. GROTHOUSE: Thank you, your Honor.
 25 BY MR. GROTHOUSE:

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1 A Yes.
 2 Q And have you ever accessed the online database?
 3 A Multiple times, yes.
 4 Q And when you accessed the online database, did you search
 5 for the -- any trademarks submitted by Mr. Picciolini?
 6 A This was a while ago, and there was a lot of -- I -- I want
 7 to say yes, I did do that. It's just very hard for me to
 8 remember --
 9 Q That's okay, Mr. Rangel.
 10 Going on, let's talk about the -- to your knowledge,
 11 was Mr. -- was Mr. Picciolini's trademark application accepted?
 12 A No, it was not.
 13 MR. GEEKIE: Objection. Foundation and hearsay, your
 14 Honor.
 15 THE COURT: Okay. So it's sustained again.
 16 So you have to lay the foundation, and I don't think
 17 you did.
 18 MR. GROTHOUSE: Okay, your Honor.
 19 Mr. McAleer was going to testify to that, so we'll
 20 just move on from that.
 21 THE COURT: Okay. That works.
 22 BY MR. GROTHOUSE:
 23 Q Mr. Rangel, after the -- after Life After Hate, the
 24 Illinois non-profit, registered its trademark applications for
 25 ExitUSA and Life After Hate, did Mr. Picciolini start any other

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1 organizations?
 2 A Yes.
 3 Q Can you tell me the organization that he started?
 4 A I believe the last -- the last one was called Free Radicals
 5 Project. But there were a couple, I believe, in between there
 6 that he was trying out.
 7 Q Can you tell me your knowledge of this Free Radicals
 8 Project?
 9 A Yeah, it's basically a mirror image of Life After Hate's
 10 work, but under Free Radicals Project. And Christian and
 11 Shannon Martinez are the cofounders. And they talk about doing
 12 exit work. They do their public speaking events, some of them,
 13 through there. Basically, it's -- looks like Life After Hate's
 14 image.
 15 MR. GEEKIE: Objection, your Honor. The answer was
 16 all hearsay, so I ask that it be stricken. It's based on a
 17 website that he read, and it's hearsay.
 18 THE COURT: Okay. Hold on a second.
 19 Okay. So to the extent that he went to the website
 20 and he viewed it and it looks something like his, he has
 21 personal witness to testify regarding.
 22 As far as what he viewed that brought him here today
 23 to be part of this lawsuit, I think that's appropriate and he's
 24 allowed to state that.
 25 What is hearsay is what's actually contained on the

1 ExitUSA.org?
 2 A Yes, we did.
 3 Q And by monitoring, did you go to type in that website?
 4 A Often.
 5 Q And when you typed in this website after the formation of
 6 Mr. Piccolini's life -- excuse me, Free Radicals Project
 7 organization in 2018, did you type in www.ExitUSA.org?
 8 A Yes, I did.
 9 Q And what happened when you typed it in?
 10 A It took me to the Free Radicals' website page, home page.
 11 Q Directly there.
 12 A Directly.
 13 Q Okay. During all this time after Mr. Piccolini left or
 14 was terminated from Life After Hate, the Illinois non-profit,
 15 and as you testified you talked about that -- you talked
 16 about -- or you mentioned that he used the ExitUSA domain name,
 17 what about Life After Hate's Twitter account?
 18 Can you tell me what Twitter account Life After Hate,
 19 the Illinois non-profit, used in 2015?
 20 A It's -- I believe it's TeamExitUSA or ExitUSATeam with a
 21 hashtag. And then we noticed that that was being redirected to
 22 Free Radicals.
 23 MR. GEEKIE: Objection. Non-responsive, Judge.
 24 THE COURT: Overruled.
 25 BY MR. GROTHOUSE:

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1 website, and to that extent it's sustained.
 2 BY MR. GROTHOUSE:
 3 Q Moving on --
 4 THE COURT: So I'm not striking -- I'm not striking
 5 what he viewed as the mirror image of Life After Hate's work,
 6 but I will not take into consideration that the cofounders are
 7 who they are because that's the hearsay part. All right?
 8 Thank you.
 9 Go ahead.
 10 BY MR. GROTHOUSE:
 11 Q Mr. Rangel, the domain name and website www.ExitUSA.org,
 12 after Mr. Piccolini started this other organization, Free
 13 Radicals, Inc., what happened to the domain name at that point?
 14 A It was redirecting directly to Free Radical Project's
 15 website.
 16 Q At what time did this domain name ExitUSA.org redirect to
 17 Mr. Piccolini's website?
 18 MR. GEEKIE: Objection. Foundation.
 19 THE COURT: Okay. To the best of your knowledge and
 20 how you would know it, foundation is sustained.
 21 BY MR. GROTHOUSE:
 22 Q Mr. Rangel, you were aware that Life After Hate, the
 23 Illinois non-profit, could not control ExitUSA.org, correct?
 24 A Correct.
 25 Q And did you monitor on a regular basis the domain name

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1 Q So, Mr. Rangel, the Twitter account @ExitUSATeam that the
 2 Illinois non-profit used, once Mr. Piccolini left or was --
 3 excuse me, terminated from the organization, what happened to
 4 that Twitter account?
 5 A We could not control it. It was -- we were locked out of
 6 it.
 7 Q And once Mr. Piccolini started this competing organization
 8 known as Free Radicals Project, Inc., what happened to the
 9 Twitter account once the -- once that organization was formed?
 10 A It was being redirected to Now@FreeRadicals.
 11 Q Well --
 12 A It would say #ExitUSATeam or TeamUSANow@FreeRadicals and
 13 then it would take you to their direction instead of our Life
 14 After Hate direction.
 15 Q And as a result of these activities -- of Mr. Piccolini's
 16 activities and his use of Life After Hate's property, did you
 17 personally come into contact or did you personally witness any
 18 consumer confusion?
 19 A Yes, we did.
 20 Q Can you talk about --
 21 THE COURT: Okay. That's sustained, because -- it
 22 can't be what a consumer -- he personally can say something,
 23 but not what other consumers would.
 24 Sustained.
 25 BY MR. GROTHOUSE:

1 Q Did -- did any person or organization communicate or reach
 2 out to you about Mr. Picciolini after he left the organization?
 3 A Yes.
 4 Q Did any person or organization reach out to you about Free
 5 Radicals Project?
 6 A Yes.
 7 Q And these persons or individuals, when they reached out to
 8 you, what did they -- we'll start with one of the individuals.
 9 MR. GROTHOUSE: Your Honor, we did stipulate that --
 10 plaintiff and defendants did stipulate not to reveal anybody's
 11 names just because they are sensitive. So when we talk about
 12 these individuals, we're going to be talking about them in
 13 general terms.
 14 THE COURT: Okay. All right. Is that what you were
 15 going to object to?
 16 MR. GEEKIE: No. I don't -- the parties have
 17 stipulated that we will keep clients, people receiving
 18 services, confidential.
 19 My objection was going to be that I anticipated
 20 Mr. Grothouse asking about the substance of what he was told --
 21 THE COURT: Okay. So --
 22 MR. GEEKIE: -- which would be hearsay.
 23 THE COURT: So part of the infringement is whether
 24 someone was confused, that substance is relevant to my
 25 determination as to whether consumers were confused.

1 MR. GEEKIE: I agree, Judge, it's relevant, the point
 2 being, though, Judge, that they're introducing it for the truth
 3 of the matter asserted, that they are confused. That's
 4 hearsay.
 5 THE COURT: Well, in any -- in any infringement case,
 6 we have to have that feedback as to how did you react when you
 7 were notified that consumers were confused, so I don't think it
 8 is hearsay. To the extent that he's saying X number of
 9 individuals were confused on specific days or times -- but if
 10 he's getting information in that people are being confused,
 11 that's not hearsay. And it has to come in. It's part of the
 12 standard.
 13 MR. GEEKIE: Well, your Honor, that's why -- that's
 14 why in a consumer confusion case you hire expert witness --
 15 THE COURT: I know. I understand that. But that's a
 16 whole different ballgame. Right? That's your response to
 17 this, and that goes to the weight, not to the admissibility at
 18 this point.
 19 So go ahead.
 20 BY MR. GROTHOUSE:
 21 Q Mr. Rangel, without revealing anybody's names, can you talk
 22 about a certain individual that you communicated with
 23 mention -- or excuse me, we'll first talk about the first
 24 individual that you communicated with about Free Radicals
 25 Project. Can you describe, in general terms, this individual?

1 A It's someone within our ranks of the support -- support
 2 group networks. Part of -- you know, it's a person that
 3 reached out and was asking what was happening with ExitUSA.
 4 Q Okay. So this person was part of the support group.
 5 A Uh-hum.
 6 Q Okay. This individual that was part of the support group,
 7 when he reached out to you, what did he ask you?
 8 How did he reach out? Let's start with that.
 9 A Direct messaging.
 10 Q And when he reached out to you via direct messaging, what
 11 did he ask you?
 12 A If I -- if I could explain what was happening with ExitUSA,
 13 did we give it away, were we keeping it, were there two -- were
 14 there two -- were there now two ExitUSA programs. Questions
 15 like that.
 16 Q Okay. And the next individual that you communicated with,
 17 can you tell me about the time range or date that you
 18 communicated with this individual?
 19 A Oh. Without going through my records, it's hard to get the
 20 dates because I -- we've -- I'm flooded with emails all the
 21 time. But the case that I think of most -- that stands out is
 22 we were specifically asked about if we continued to work with
 23 Christian, if we worked with Free Radicals, if ExitUSA belonged
 24 to Life After Hate or did it belong to Free Radicals, if we
 25 still worked with Christian, why were we allowing a violation

1 of privacy and confidentiality occur, things like that.
 2 Q Mr. Rangel, let me direct your attention to LAH Exhibit
 3 Number 44 for identification purposes.
 4 (Tendered.)
 5 Q Can you please identify what this exhibit is?
 6 (Pause in proceedings.)
 7 A Sorry. It's just a lot I'm looking through.
 8 Q No worries.
 9 A It's one of those communications that I was referencing
 10 concerning the concerns and confusion in an email.
 11 Q Can you tell me, please, if -- who the individual Keiko
 12 Kawabe is?
 13 A She is a journalist of sorts that reached out to us asking
 14 us very specific questions about ExitUSA.
 15 Q Can you tell me if Sammy@LifeAfterHate.org is your email?
 16 A It is.
 17 Q Can you tell me if these -- this inquiry by Mr. --
 18 Ms. Kawabe -- excuse me, sorry.
 19 Can you please tell me whether or not Life After Hate,
 20 the Illinois non-profit, stores communications like this?
 21 A Absolutely.
 22 Q Can you tell -- can you tell me how the non-profit stores
 23 communications like this?
 24 A We use a platform called Support Me. And we have created
 25 an archive, like archive folders, for inquiries such as this.

1 Q So you keep emails like this in the regular course of
 2 business.
 3 A Yes.
 4 Q And this is a business record of Life After Hate --
 5 A It is a business record of Life After Hate.
 6 Q Okay. Let me direct your attention, Mr. Rangel.
 7 Can you please talk about, briefly, just the substance
 8 of the conversation that you had with Ms. Kawabe?
 9 MR. GEEKIE: Objection. Hearsay, your Honor, and
 10 relevance.
 11 Your Honor, this is from a journalist, and confusion
 12 of journalists is not a relevant topic in an infringement.
 13 THE COURT: Well, I suppose a journalist could be any
 14 consumer, right? But that's not how it's coming about.
 15 All right. It's sustained. So it's sustained as far
 16 as the hearsay, and only to the extent that she is being
 17 confused as a consumer. So if there's that narrow issue, you
 18 can bring that in. And I don't know because I don't have the
 19 knowledge you have.
 20 MR. GROTHOUSE: Can you explain that further, your
 21 Honor? I'm sorry.
 22 THE COURT: Yes. So if she's looking at the website
 23 and she's confused by it and she contacts them and says I'm
 24 confused, what's what, that's relevant.
 25 MR. GROTHOUSE: Yes, that's exactly what occurred.

1 THE COURT: Okay. So narrowly.
 2 MR. GROTHOUSE: Yes.
 3 THE COURT: Okay.
 4 MR. GROTHOUSE: To the extent that that is what
 5 occurred.
 6 THE COURT: Right.
 7 BY MR. GROTHOUSE:
 8 Q So, Mr. Rangel, let me direct your attention to an email
 9 sent to you, I believe it is August 22nd, 2018. It starts --
 10 LAH2257, goes on to 2258.
 11 Can you please read from this email starting at "Part
 12 of my confusion"?
 13 A Yes, he says --
 14 MR. GEEKIE: Objection, your Honor. The document
 15 speaks for itself --
 16 THE COURT: Right.
 17 MR. GEEKIE: -- and it's improper to ask this
 18 witness --
 19 THE COURT: Yes, it really is. So it's interesting,
 20 in -- it's been so many years that I've been sitting here, but
 21 it seems like it's getting worse and worse over time with the
 22 way people use documents.
 23 So he speaks for what has happened. So the testimony
 24 should be along the lines of:
 25 Did you have a conversation with other people that

1 expressed concern about the confusion?
 2 Yes.
 3 Who was that?
 4 And in that conversation, did you respond to her?
 5 Yes, I did.
 6 How?
 7 By email.
 8 Is this the email that you sent her?
 9 This is the kind of way that we use documents. We
 10 don't just jump to it and read it. And it's -- then there's
 11 too much mush in there as well, so we'll try a different way,
 12 okay?
 13 MR. GROTHOUSE: Okay.
 14 THE COURT: So sustained.
 15 MR. GROTHOUSE: Okay.
 16 BY MR. GROTHOUSE:
 17 Q Mr. Rangel, did you interact or communicate with
 18 individuals that expressed -- that expressed confusion about
 19 Free Radicals and, for example, the Twitter account?
 20 A Yes.
 21 Q And did you interact or communicate with these individuals
 22 by email?
 23 A Some by email, some by direct messaging.
 24 Q And was one of these individuals an individual named Keiko?
 25 A Yes.

1 Q And did you enter -- did you communicate with this
 2 individual on August -- in August of 2018?
 3 A Yes, I did.
 4 Q And in this email exchange, did Keiko express to you any
 5 confusion about Free Radicals, the organization?
 6 A About Free Radicals, the organization, ExitUSA, the
 7 organization, and our practices around confidentiality and
 8 privacy.
 9 Q And what confusion -- what did she say about the
 10 organization?
 11 A She couldn't tell --
 12 MR. GEEKIE: Objection, your Honor. Hearsay again.
 13 And, again, this is not consumer confusion. This is a
 14 writer --
 15 THE COURT: Why is she less than anybody else being a
 16 consumer?
 17 MR. GEEKIE: Because she doesn't consume the product.
 18 She is reporting here. She puts down she's a writer. She
 19 signs it as a writer. She's not a consumer --
 20 THE COURT: That's an interesting thought because I
 21 don't know about that. I mean, we mentioned this earlier as
 22 far as who is the consumer. I mean, the website and the
 23 information is certainly for a non-profit broader than simply
 24 the person that is receiving treatment, right?
 25 MR. GROTHOUSE: I'd also like to argue, your Honor,

1 that when it comes to the marketing or advertising of services,
2 it is important that media and journalists do -- that are
3 interested in these services, that do talk about these
4 services, that do recommend these services, understand and are
5 not confused when they go to specific websites or when they go
6 to a Twitter page --

7 THE COURT: Well, I don't know the answer for the
8 issue of the definition of a consumer now. So he can answer
9 the question. When I review this, if it's not a consumer based
10 upon the case law review, I will just exclude it. There's no
11 jury in the box. Okay?

12 Go ahead.

13 BY MR. GROTHOUSE:

14 Q Mr. Rangel, can you please talk about what Keiko
15 communicated to you about the organization -- about your
16 organization and her efforts to figure out your organization?

17 A She wanted to know if we controlled ExitUSA or if Christian
18 did or if we did that in partnership. And if we did it in
19 partnership, were we in -- did we commonly practice violating
20 privacy, outing people on social media by name to -- to other
21 groups. And if not, why haven't we done something to remedy
22 this or to rectify this.

23 Q And can you please read the email that she sent to you that
24 you received, starting at: "Part of my confusion"?

25 MR. GEEKIE: Objection, your Honor.

1 as reputation has Life After Hate, the Illinois non-profit,
2 sustained?

3 A Reputational harm is -- is most important to us at this
4 point because our image about being -- having -- providing
5 private and confidential services is really the basis of the
6 trust that we establish with the people that we serve, with the
7 people that we're reaching out to. And so if our credibility
8 and integrity around maintaining privacy and confidentiality of
9 those interactions, communications, connections, comes into
10 question, we're ruined as an organization. We're dead in the
11 water. We can't afford to have our image, our integrity,
12 viewed in that light that we don't protect that at all costs.
13 And this was a good indicator of where that confusion was
14 leading people to think.

15 Q So why -- can you explain why your credibility of keeping
16 confidentiality would be damaged due to Mr. Picciolini and Free
17 Radical's use of the marks?

18 A Well, this journalist, if she wrote an article that
19 highlighted us as conducting ourselves in this way, where we
20 would confirm or deny publicly on platforms that we've worked
21 or not worked with somebody, the word gets out. It's a
22 word-of-mouth business. The people that we're trying to help
23 are already very paranoid and afraid and skittish. They're
24 trying to hide the idea that they're trying to change. And we
25 wouldn't be able to provide those services. They wouldn't come

1 THE COURT: Yes, it's not necessary.

2 MR. GROTHOUSE: Okay.

3 THE COURT: Okay? So sustained.

4 MR. GROTHOUSE: Very well, your Honor.

5 BY MR. GROTHOUSE:

6 Q Mr. Rangel, can you please tell me, as a result of Free
7 Radicals and Mr. Picciolini using the Life After Hate, Illinois
8 non-profit's marks and Twitter account and ExitUSA domain name,
9 can you please tell me the result or any damages that the
10 organization has experienced?

11 MR. GEEKIE: Objection. Foundation, your Honor.

12 THE COURT: Let me just -- it was a long one so I
13 just want to read it again.

14 MR. GEEKIE: Form, too, your Honor.

15 THE COURT: Okay. So it's really a question, so
16 simply about damages. But I suppose the damages -- the
17 broadness of it is what exactly is the damage flowing from,
18 right?

19 MR. GROTHOUSE: Sure.

20 THE COURT: So I'll let you break it down, but you can
21 ask the damages question.

22 BY MR. GROTHOUSE:

23 Q Mr. Rangel, as a result of Mr. Picciolini and the Free
24 Radicals Project organization's use of Life After Hate's
25 trademarks, Life After Hate, and ExitUSA, what damage insofar

1 to us. And then our professional partners would lose
2 credibility with us as well. And then the general public who
3 stands behind us would lose faith in our ability to -- to
4 operate in a safe and ethical manner.

5 Q And how important to the organization is the use of their
6 social media accounts, such as YouTube and Twitter?

7 A We're a virtual organization, so we rely on those platforms
8 heavily. I can't say totally, but it -- as a virtual
9 organization, technology and these universal platforms where
10 people engage in this type of discussion is everything to us.

11 Q And so if these social media accounts, since -- as a result
12 of Mr. Picciolini's and Life -- excuse me, Free Radicals
13 Project control over them, what are the damages -- what is the
14 harm, I should say, that Life After Hate, the Illinois
15 organization, has faced?

16 A We can't control those platforms anymore, so we can't
17 control what's being said or done or how they're behaving or
18 interacting, but yet those -- those platforms are still
19 operating, and so they continue to reflect on us poorly.
20 Monetary. We could lose funders, donations. We could lose
21 people reaching out to us on their own behalf or on behalf of
22 someone in need of our services. The list could go on.

23 Q So if -- if the organization -- if the non-profit Illinois
24 organization made a good impression to consumers through one of
25 your speeches by word-of-mouth and they went on the Twitter

1 account or went to the Twitter account or went to ExitUSA.org,
 2 what happens to those consumers, potential consumers?
 3 MR. GEEKIE: Objection. Foundation, form.
 4 THE COURT: Overruled. I'm going to let him answer.
 5 Go ahead.
 6 BY THE WITNESS:
 7 A Could you repeat, please?
 8 BY MR. GROTHOUSE:
 9 Q Sure.
 10 It -- in many instances, when Life After Hate, the
 11 Illinois non-profit, provides services, whether it's
 12 intervention services, speaking services, do you -- do -- does
 13 the organization get a positive reaction?
 14 A Yeah, there tends to be an uptick in contacts, you know,
 15 people being driven to our sites, being driven to the
 16 organization, projects, communications. There's a number of
 17 benefits from that.
 18 Q What happens after this sort of uptick? What happens if
 19 one of these users or consumers goes to ExitUSA.org?
 20 A They're redirected to somebody else, not to us.
 21 MR. GEEKIE: Objection. Foundation.
 22 THE COURT: No, that's overruled.
 23 He can answer.
 24 BY THE WITNESS:
 25 A They're redirected to Christian, not to Life After Hate.

1 THE COURT: Based upon his experience, so ... go
 2 ahead.
 3 BY MR. GROTHOUSE:
 4 Q And what happens when they go to the Twitter account, the
 5 @ExitUSATeam Twitter account?
 6 A They're told to go to Free Radicals, not Life After Hate.
 7 Q Okay. And how are they told to do that?
 8 A It explicitly says ExitUSATeamNow@FreeRadical\$ and then
 9 you're directed to go there with a link.
 10 Q Okay.
 11 THE COURT: So I actually think I may have limited his
 12 testimony too much before in the sense of the Twitter -- or the
 13 tweets where we were -- you objected because they were
 14 political and, you know, going off on a tangent.
 15 But for damages sake, if they're directed to a Twitter
 16 account or another account that is ideologically aligned to
 17 another person or people who have stated things that are
 18 ideologically in conflict, that would be damaging, so I think
 19 that testimony can come in as far as damages are concerned.
 20 MR. GEEKIE: Your Honor, that information pre-dated
 21 leaving. The testimony was that those tweets about the Trump
 22 administration were part of the conflict that led to him
 23 leaving.
 24 THE COURT: Okay. Okay. Were there any --
 25 MR. GROTHOUSE: To --

1 THE COURT: Hold on. Were there any post breakup
 2 tweets?
 3 BY MR. GROTHOUSE:
 4 Q Mr. Rangel?
 5 A Yes.
 6 THE COURT: Okay. So I'll let you explore that for
 7 damages sake.
 8 I truncated it earlier. But now, in listening to you,
 9 I can see a different avenue.
 10 BY MR. GROTHOUSE:
 11 Q So, Mr. Rangel, let me direct you to the Twitter account
 12 @ExitUSATeam and the postings on that Twitter account. From
 13 your direct knowledge of viewing that Twitter account, do you
 14 remember seeing, viewing any tweets on that Twitter account
 15 after Mr. Piccolini left the organization -- or was terminated
 16 from the organization Life After Hate, the Illinois non-profit?
 17 A Yes.
 18 Q Do you recall some of the content of those tweets?
 19 A Routinely there were tweets that we wouldn't have cleared
 20 to pass our messaging that would either shed a shaming or
 21 condemning light on a white supremacist that he might encounter
 22 or a political comment or content that we wouldn't -- we would
 23 not speak about in those ways. So there were a number of
 24 things that we -- were being posted that we would not -- we
 25 would not have put out of our own organization because that's

1 not how our communications are communicated with the general
 2 public around those issues.
 3 Q And Mr. Piccolini's tweets, both before and after he was
 4 terminated from the Life After Hate, Illinois non-profit, was
 5 there any consequences to those tweets or communications?
 6 A Absolutely.
 7 MR. GEEKIE: Objection. Form, your Honor.
 8 THE COURT: Okay. Overruled.
 9 BY THE WITNESS:
 10 A Yes, there were consequences.
 11 BY MR. GROTHOUSE:
 12 Q Can you tell me some of those consequences?
 13 A We lost half -- almost a half million dollar grant from the
 14 Obama administration. A number of articles were written after
 15 that putting a bad light on Life After Hate because of that.
 16 Q Can you explain how you lost a half a million dollar grant?
 17 A Well, in 2016, the Obama administration towards the end of
 18 their term awarded Life After Hate, I believe, around a
 19 \$455,000 grant from the Department of Homeland Security
 20 Community Connections Countering Violent Extremism Department.
 21 We were, I believe, one of 33 recipients of some of that money.
 22 And we were also highlighted as a leading group to get this
 23 money for the work that we were doing.
 24 During the election process, Tony and Christian --
 25 Tony started trying to tell Christian to please stop tweeting

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1 some of these inflammatory messages about Trump that were in
2 some cases threatening to the -- to Trump. And Christian said:
3 Well, this is my personal account. And we were, like: People
4 may not separate you from Life After Hate as a non-profit,
5 these are not things that align with our positioning, our
6 stance, the way we communicate with these things.

7 And so then later, I believe members of the
8 administration were quoted in newspaper articles --

9 MR. GEEKIE: Objection. Hearsay.

10 BY THE COURT:

11 Q Members of the administration, the Obama administration?

12 BY THE WITNESS:

13 A No, Trump administration.

14 THE COURT: Oh, okay. Regarding what? What are we
15 going to go to?

16 He can answer because I can strike it later, because I
17 don't know what it is going to be.

18 Go ahead.

19 Answer the question.

20 BY THE WITNESS:

21 A Mentioning by name Christian Picciolini and mentioning --
22 screenshotting his tweets and mentioning Life After Hate in the
23 same article as why would we fund programs like this.

24 MR. GEEKIE: First, it's all hearsay, Judge.

25 Secondly, this is all irrelevant. They haven't given a time

1 MR. GROTHOUSE: Yes.

2 THE COURT: Okay.

3 BY MR. GROTHOUSE:

4 Q So, Mr. Rangel, after Mr. Picciolini was terminated from
5 the organization and he was still associated with the Illinois
6 non-profit by using their marks in social media, was that a big
7 problem?

8 A That was a major problem for us, yes.

9 MR. GROTHOUSE: Thank you, your Honor.

10 THE COURT: Okay. Ready for cross?

11 MR. GEEKIE: Yes, your Honor.

12 THE COURT: Are you going to use a computer? Or do
13 you want to use --

14 MR. SCHULTIS: If you can switch the monitors.

15 THE COURT: Sure, yes. Are you going to do HDMI as
16 well?

17 MR. SCHULTIS: Connect VGA.

18 THE COURT: Okay. Let me switch that then.

19 From that table? You're going to stay there?

20 Hold on a second. Let's make sure.

21 Am I getting your computer on the screen?

22 Great. Okay. All set.

23 MR. GEEKIE: Thank you, Judge.

24 CROSS-EXAMINATION

25 BY MR. GEEKIE:

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Rangel - Direct by Grothouse

1 frame. But the time frame for this was prior to Mr. Picciolini
2 leaving. They're trying, by throwing it out there without time
3 or dates, trying to imply that this was post-leaving when it
4 was all before he left the organization.

5 THE COURT: Okay. Cross-examine on that then. Okay?

6 BY MR. GROTHOUSE:

7 Q Mr. Rangel, would it be safe to say that Life After Hate,
8 the Illinois non-profit, does not want to be associated with
9 language like the tweets that you're talking about?

10 A That is what we are saying.

11 Q After Mr. Picciolini was terminated from the organization,
12 would it be safe to say that the Illinois non-profit Life After
13 Hate did not want to be associated with Christian Picciolini
14 anymore?

15 A That is correct.

16 Q And is one of those reasons that the Illinois non-profit
17 did not want to be associated with Mr. Picciolini is because of
18 his inflammatory social media posts?

19 A Absolutely.

20 Q And is another one of these reasons, as you mentioned
21 before, his carelessness with confidentiality?

22 A Absolutely.

23 MR. GEEKIE: Objection. Leading, your Honor.

24 THE COURT: Okay. He's summarizing. I don't mind.
25 Are you almost done?

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Rangel - Cross by Geekie

1 Q Mr. Rangel, you testified a short time ago about two people
2 that were your evidence of consumer confusion.

3 The first person -- the second person, let's cover
4 her. That was Keiko, right?

5 A I believe so. Yes, sir.

6 Q Okay.

7 MR. GEEKIE: Could you pull up the Keiko --

8 MR. JACOBSON: 44.

9 MR. GEEKIE: 44? I'm sorry, Plaintiff's 44.

10 BY MR. GEEKIE:

11 Q And so this email is dated August 21st of 2018, right?

12 Do you see that --

13 A Yes.

14 Q -- in the upper right?

15 A August 21st, yes.

16 Q Of 2018.

17 A Yes.

18 Q Now, it says that -- if you go down, do you see where it
19 says, "I'm aware that Christian left Life After Hate"?

20 A Yes.

21 Q And so Ms. Kawabe informed you that she was aware that
22 Mr. Picciolini had separated from Life After Hate, correct?

23 A Yes.

24 Q So there wasn't any confusion that he still might be
25 associated with Life After Hate because she knew he had left,

1 correct?

2 A That's not correct.

3 Q Well, she knew he had left the entity, right?

4 A That is correct.

5 Q And the issues that she asked about regarding disclosing

6 people, people's names, that had occurred before Mr. Picciolini

7 had left in August of 2017, right?

8 A I do not know that. I don't remember if we shared

9 screenshots of that, because I don't know the date of that

10 violation.

11 Q Okay. And you testified that that violation was pretty

12 important in dismissing or having Mr. Picciolini leave,

13 correct?

14 A No.

15 Q You testified earlier that Mr. Picciolini disclosing that

16 information was what led to all the strife at the company, at

17 Life After Hate, in the summer leading up to his leaving the

18 company, didn't you?

19 A This event has nothing to do with those violations. These

20 are separate violations.

21 Q Okay. But this event then, it doesn't say when it

22 happened, does it?

23 A Not in the email; but I believe when you look at the link,

24 it does.

25 Q Okay. Did you -- have you produced any evidence to show

1 with domestic terror organizations like the Life After Hate

2 grant, correct?

3 MR. GROTHOUSE: Objection, your Honor.

4 THE COURT: You need to stand for objections.

5 MR. GROTHOUSE: Objection, your Honor. Counsel

6 indicated that it was Mr. Picciolini's position that this is

7 the reason why the grants were being withdrawn. Mr. Rangel

8 would have no idea --

9 THE COURT: It's speculation. And so unless he was --

10 unless he was informed that that was the reason, then it's

11 speculation, and the objection is sustained.

12 BY MR. GEEKIE:

13 Q And that grant was rescinded in the spring of 2017,

14 correct?

15 A I believe so, yes.

16 Q Okay. And Mr. Picciolini didn't leave Life After Hate

17 until August of 2017, right?

18 A Correct.

19 Q More than half a year later is when he left, correct?

20 A Well, however many months from June to August, yes.

21 Q So -- so the \$455,000 in damages that you claim occurred

22 while he was still associated with Life After Hate had nothing

23 to do with his -- the alleged infringement here, does it?

24 A I disagree.

25 Q Well, the damage occurred in -- that you claim occurred in

1 this supposed violation by Mr. Picciolini? Do you have it here

2 today as your evidence?

3 A This one?

4 Q Yeah.

5 A I -- I don't -- we've produced so much, I can't tell you

6 for certain what we have and don't have here today.

7 Q Well, you didn't -- you didn't have it as an exhibit when

8 you testified, did you? Wasn't shown to you today, was it?

9 A No, no.

10 Q You testified that the company could lose dollars because

11 of Mr. Picciolini's conduct. Exactly how many dollars has the

12 company lost?

13 A Well, to start with, \$455,000.

14 Q Okay. That 455,000, that all occurred during the election

15 of 2016, right? Those tweets occurred?

16 A Those tweets, yes, sir.

17 Q Okay. And then the Trump administration when it rescinded

18 the grant -- and you're aware that Mr. Picciolini's position is

19 that that grant was rescinded because the Department of

20 Homeland Security was changing the focus from domestic terror

21 to foreign Middle Eastern terror, right?

22 A Can you repeat that? I -- I'm not sure --

23 Q You were aware that when the Trump administration came in,

24 the Department of Homeland Security, with respect to this grant

25 and other grants, they were rescinding grants that had to do

1 early 2017, right?

2 A The initial damage.

3 Q Okay. And that initial damage, that 455,000, that had to

4 do with tweets by Mr. Picciolini, right?

5 A Yes.

6 Q Had nothing to do with the alleged infringement by

7 Mr. Picciolini because he hadn't left the organization, had he?

8 A I don't know how to answer that question, sir. I'm not

9 sure --

10 Q Now, you talked about the first person who you claim had

11 confusion. You said you got a direct message from that person.

12 What's a direct message?

13 A Direct messages are like when they -- either like a text

14 message or like through Messenger. And Messenger -- like

15 Messenger is like a direct messaging that nobody else can see.

16 So if they're messaging me from Facebook, they can -- only I

17 can see the message because it's a direct message to me. And

18 you can do that through Twitter, Instagram, things like that.

19 Q And that was -- that -- that message of consumer confusion,

20 that was pretty important to Life After Hate, right?

21 A Yes, sir.

22 Q You didn't produce that as evidence today, did you?

23 A I produced it when we were asked to.

24 Q Did you produce it -- did you testify about the actual copy

25 of that message today?

1 early 2017, right?

2 A The initial damage.

3 Q Okay. And that initial damage, that 455,000, that had to

4 do with tweets by Mr. Picciolini, right?

5 A Yes.

6 Q Had nothing to do with the alleged infringement by

7 Mr. Picciolini because he hadn't left the organization, had he?

8 A I don't know how to answer that question, sir. I'm not

9 sure --

10 Q Now, you talked about the first person who you claim had

11 confusion. You said you got a direct message from that person.

12 What's a direct message?

13 A Direct messages are like when they -- either like a text

14 message or like through Messenger. And Messenger -- like

15 Messenger is like a direct messaging that nobody else can see.

16 So if they're messaging me from Facebook, they can -- only I

17 can see the message because it's a direct message to me. And

18 you can do that through Twitter, Instagram, things like that.

19 Q And that was -- that -- that message of consumer confusion,

20 that was pretty important to Life After Hate, right?

21 A Yes, sir.

22 Q You didn't produce that as evidence today, did you?

23 A I produced it when we were asked to.

24 Q Did you produce it -- did you testify about the actual copy

25 of that message today?

1 A I testified about the message --
 2 Q Have you seen the message today as evidence?
 3 A No, I have not seen the message -- that message today.
 4 Q Okay. Did you save that message?
 5 A I did.
 6 Q You testified about 30 states that Life After Hate operates
 7 in or has provided services in, and you were kind of vague
 8 about when these occurred and where they occurred and who did
 9 them. Most of the services, the exit services, that Life After
 10 Hate did while Mr. Piccolini was there were done by
 11 Mr. Piccolini, weren't they?
 12 A Yes.
 13 Q And, in fact, he was the ExitUSA program director, right?
 14 A As of April 2017, yes.
 15 Q And it was his primary job in association with Life After
 16 Hate to render or provide these exit services, right?
 17 A As of April 2017, yes.
 18 Q And he traveled the country and the world to do them,
 19 right?
 20 A We don't do exit work around the world. We do it in the
 21 U.S.
 22 Q Right. You do.
 23 Mr. Piccolini travels the world providing exit
 24 services, correct?
 25 A Not for us, no.

1 Q No, but he does --
 2 MS. SAPER: Objection. Calls for speculation as to --
 3 THE COURT: It does. And it's sustained. But, more
 4 importantly, it's not your witness, so your colleague needs to
 5 object to his own witness.
 6 No, it's done. I gave the one -- I gave the one
 7 strike pass.
 8 BY MR. GEEKIE:
 9 Q While Mr. Piccolini was associated with Life After Hate,
 10 he was really the nationally and internationally recognized
 11 figurehead of Life After Hate, correct?
 12 A I disagree.
 13 Q He had the TV show on MSNBC, right?
 14 A I don't know.
 15 Q He was the one that was featured in a story by *60 Minutes*,
 16 correct?
 17 A That would have been, I believe, post us. And there was
 18 also a violation of confidentiality in that interview.
 19 MR. GEEKIE: Move to strike, your Honor.
 20 THE COURT: I don't know how -- why is it -- because
 21 it's nonresponsive?
 22 MR. GEEKIE: Because there was no -- it was
 23 nonresponsive, your Honor. There was a violation of privacy in
 24 the interview?
 25 BY THE WITNESS:

1 A Yes.
 2 MR. GEEKIE: I'll move on, your Honor.
 3 THE COURT: I'm not going to strike it.
 4 MR. GEEKIE: Could you pull up of Defendants' Exhibit
 5 11, please?
 6 I'm sorry, Judge. I'm getting my hard copy so I can
 7 read it --
 8 THE COURT: That's okay.
 9 MR. GEEKIE: -- because I can't read that.
 10 Okay, that's better.
 11 BY MR. GEEKIE:
 12 Q Okay. You talked about the formation or what was going on
 13 in Wisconsin. I think you testified that the Wisconsin
 14 operation was an online blog. Is that right?
 15 A The online journal?
 16 Q Online journal.
 17 A Yes.
 18 Q Okay. So it was an online journal.
 19 And then that online journal operated into -- as Life
 20 After Hate, right?
 21 A Can you repeat that? I'm sorry.
 22 Q That online journal operated under the name "Life After
 23 Hate," correct?
 24 A Yes.
 25 Q And it was doing that in 2009 and 2010, right?

1 A I only know of 2010.
 2 Q Okay. So it was doing it in 2010, and it operated as Life
 3 After Hate into 2011, right?
 4 A Correct.
 5 Q And it operated under Life After Hate until the Illinois
 6 company was formed, right?
 7 A Yes.
 8 Q Okay. And, now, you testified that when the Illinois
 9 company was formed, the Illinois not for profit, that you and
 10 Tony McAleer and Arno and Frank Meeink were part of that
 11 organization when it transformed from the online journal to the
 12 Illinois not for profit, right?
 13 A Yes.
 14 Q Okay. But if you look here, here is an email from
 15 Mr. Piccolini to you.
 16 Do you see that?
 17 You're one of the recipients?
 18 A The -- yes, the July 6th --
 19 MR. GROTHOUSE: Objection. Foundation.
 20 THE COURT: I didn't hear what he said. What was your
 21 objection?
 22 MR. GROTHOUSE: Foundation.
 23 THE COURT: Okay. No, he was answering the foundation
 24 question, so overruled.
 25 Go ahead.

1 BY MR. GEEKIE:
2 Q That's you, right? There?
3 A SammyRangel@yahoo.
4 Q That was your email address?
5 A At the time, yes.
6 Q And you have no reason to believe you didn't receive this
7 document, right?
8 A No.
9 MR. GEEKIE: Move for the admission of this,
10 Defendants' 11, your Honor?
11 THE COURT: Okay. Any objection?
12 MR. GROTHOUSE: No, your Honor.
13 THE COURT: It will be admitted.
14 (Said exhibit received in evidence.)
15 BY MR. GEEKIE:
16 Q And although you claim that you were part of the
17 organization at this time, do you see Mr. Picciolini's address
18 as Christian@LifeAfterHate?
19 A I do.
20 Q Okay. That LifeAfterHate.org, that was the -- that was the
21 email address for Life After Hate, right?
22 A Yes.
23 Q And below that you'll see a CC.
24 ArnoMichaelis@LifeAfterHate Arno@LifeAfterHate.org. Right?
25 Do you see that?

1 A Yes, uh-hum.
2 Q And Mr. -- your email address, Mr. Rangel, you don't have a
3 Life After Hate address, do you?
4 A Probably not yet, no.
5 Q Not yet, because you --
6 A I don't know. I don't know. I may have. I have to go
7 back to my records to see when I first used that. It's
8 possible.
9 Q It didn't get sent to you at Life After Hate address, did
10 it?
11 A Correct. No, it was sent to *Yahoo*, my *Yahoo* address.
12 Q And Mr. McAleer, it didn't get sent to a Life After Hate
13 address for him, did it?
14 A No.
15 Q And Mr. Meeink, it didn't get sent to a Life After Hate
16 address for him, did it?
17 A No.
18 Q And that's because the three of you weren't yet part of the
19 Life After Hate organization formally, were you?
20 A I don't know how you can say that. I was. I testified
21 that I was.
22 Q You didn't even have email addresses for Life After Hate
23 yet.
24 A Maybe not, but we were -- I still have proof of like
25 contributing, being there, doing things, going -- going to

1 events like -- that -- so, yes, I don't have a Life After Hate
2 email here, but that didn't mean I wasn't a part of the
3 organization as the online journal.
4 Q When somebody comes to Life After Hate, the Illinois
5 corporation, and they start working for you or they become a
6 board member, the first thing you do is give them an email
7 address, don't you?
8 A Under the Illinois corp.?
9 Q Yes.
10 A Yes, sir.
11 Q Okay. Now, let's look at the text of this email that was
12 sent to you and Mr. McAleer. It's from Mr. Picciolini, right?
13 A Yes.
14 Q And he talks about T.J. That was T.J. Leyden; is that
15 right?
16 A Correct.
17 Q And he was -- he was not going to be in the organization
18 going forward. That's -- that's what the gist of this first
19 part of the email is, right?
20 A I believe so.
21 Q And in this email, Christian Picciolini informs you and
22 informs Tony and informs Frank Meeink that he's making Life
23 After Hate a not-for-profit, right?
24 A Where do you see that?
25 Q He says he knows -- "I have an attorney, Mike Abramson," in

1 the second line, "a good friend of mine."
2 Do you see that?
3 A I do.
4 Q And Mr. Picciolini says "He will agree to do our 501(c)(3)
5 for free."
6 Do you see that?
7 A I do.
8 Q And he says, "We move on."
9 Do you see that in the third line?
10 A Yes.
11 Q He doesn't ask anywhere for your opinion or Sammy's or
12 Mr. McAleer's about becoming a 501(c)(3), does he?
13 A In this body of text? No.
14 Q Okay. In fact, he was just telling you, he made the
15 decision that this would be a 501(c)(3).
16 A You don't have the entire context of the history leading up
17 to this email. So, no, that's not true.
18 Q The fact is, though, that you weren't yet part of the
19 organization. You didn't even have an email address. So you
20 weren't even participating, were you?
21 A I -- I have produced for you the evidence of my
22 participation before the Life After Hate, Illinois non-profit.
23 I've sent that --
24 Q Okay.
25 A -- based on your requests.

1 Q Okay. But you didn't even rank enough to have an email
 2 address at the organization, did you?
 3 A I disagree with your interpretation of this email.
 4 Q Did you have an email address at the organization?
 5 A I did not -- I don't know, to be honest. I may have. But
 6 just like you saw Christian emailed me at the gmail when I
 7 certainly was the executive director of Life after -- it's --
 8 we often used emails interchangeably, as well did Christian, so
 9 I don't -- I can't say for certain that at this juncture I
 10 didn't have -- I'd have to go back and look at my records.
 11 Q Now, the original Life After Hate, this online journal that
 12 was started, as you said, in 2010, was it formally incorporated
 13 in Wisconsin?
 14 A At the time, I didn't know that.
 15 Q At the time you didn't know? What time?
 16 A 2010, when I met Arno.
 17 Q Okay. But you know now it was incorporated, correct?
 18 A I do know now, yes.
 19 Q Okay. So it was --
 20 THE COURT: Can I just stop you there? Because are we
 21 talking about a non-profit incorporation? Are we talking --
 22 because I thought non-profits were something different.
 23 Incorporation, like, literally? Like a company?
 24 MR. GEEKIE: Yes, as a company.
 25 THE COURT: Okay. So not as a non-profit.

1 MR. GEEKIE: Well -- yes, your Honor, it was -- it
 2 was -- the testimony will come in through Mr. Picciolini that
 3 it -- that it was not a non or not-for-profit, as they're
 4 sometimes called, in Wisconsin.
 5 THE COURT: Okay. Thank you.
 6 MR. GROTHOUSE: Objection, your Honor. It's my
 7 understanding that the Wisconsin entity was a non-stock
 8 corporation.
 9 THE COURT: Okay. So that you're both going to have
 10 to clear that up factually on the record from the witnesses.
 11 Okay?
 12 MR. GEEKIE: That's an objectionable point, your
 13 Honor.
 14 THE COURT: Well --
 15 MR. GEEKIE: Could we turn --
 16 THE COURT: So, you know, the problem is that there's
 17 a looseness in your questioning and in the answers that -- I
 18 need to know these specifics. So we will get to it, but
 19 that -- just know, all of you know, that that's something I
 20 need to find out. Okay?
 21 MR. GEEKIE: And to help you find out, could we go to
 22 Life After Hate Exhibit 14, please?
 23 And I'll move for the admission of this. It's
 24 indicated as an exhibit by Life After Hate. And we'll
 25 stipulate to its admissibility, Judge.

1 THE COURT: Okay. Anyone have any trouble?
 2 MS. SAPER: No.
 3 THE COURT: All right. It will be admitted.
 4 (Said exhibit received in evidence.)
 5 BY MR. GEEKIE:
 6 Q Have you ever seen this document before?
 7 A Can I see the other pages?
 8 Q Are there more pages to it?
 9 A It says one of three.
 10 (Pause in proceedings.)
 11 A I have seen this document.
 12 Q And it's your understanding that that document was the
 13 formal incorporation document of which you've called the online
 14 journal, correct?
 15 A Correct.
 16 Q And can we go to the first page again?
 17 And you'll see under the Articles of Incorporation, it
 18 says it's a non-stock corporation?
 19 A Yes.
 20 Q It doesn't anywhere say that it's a not-for-profit
 21 corporation, does it?
 22 MR. GROTHOUSE: Objection, your Honor. I believe the
 23 document speaks for itself.
 24 THE COURT: Okay. He can -- he can look at it if he
 25 wants, so overruled.

1 BY THE WITNESS:
 2 A I don't see that wording on here, no.
 3 BY MR. GEEKIE:
 4 Q Okay.
 5 A I did -- thought I saw it on the third page.
 6 Q Do you want a hard copy?
 7 A Yeah.
 8 Q Would that help you?
 9 A That would be helpful. Thank you.
 10 MR. GEEKIE: May I approach, your Honor?
 11 THE COURT: Sure.
 12 (Tendered.)
 13 BY THE WITNESS:
 14 A Thank you, sir.
 15 All right, I've looked at it. I've looked at it.
 16 BY MR. GEEKIE:
 17 Q You've had a chance to look at it?
 18 A Yes, sir.
 19 Q It doesn't say anywhere that it's a not for profit, does
 20 it?
 21 A I am -- am I misreading the third page where it says
 22 non-stock non-profit corporation operating as a charitable
 23 organization?
 24 Q Charitable organization. Okay.
 25 And, now, you testified that the online journal

1 became, to quote -- I wrote this down -- it became part of our
 2 organization.
 3 Do you remember your testimony?
 4 A I believe I said something like that, yes.
 5 Q Okay. And by that did you mean then that this entity,
 6 this -- this Wisconsin entity then became part of the Illinois
 7 Life After Hate?
 8 A No. It -- more or less, it absorbed all the operations of
 9 that organization.
 10 Q Okay. It didn't --
 11 A And people.
 12 Q It didn't absorb the assets of the Illinois corporation,
 13 did it?
 14 A Well, the website would be an asset.
 15 Q Okay.
 16 A And the programs, like Kindness, Not Weakness, would be an
 17 asset. And the people. Arno would have been an asset.
 18 Q Okay. Now, in 2012, that's when the new company in
 19 Illinois was formed, right?
 20 A No. August of 2010.
 21 Q The Illinois --
 22 A 2011. Sorry.
 23 Q 2011.
 24 A Yes.
 25 Q Okay.

1 Can we have Defendants' Exhibit 10, please?
 2 You claim you're a cofounder of that --
 3 A Illinois?
 4 Q -- organization, Illinois organization, right?
 5 A Yes, sir.
 6 Q Do you -- do you have Exhibit 10 in front of you?
 7 A On the screen I do, yes.
 8 Q Okay. And at the bottom, do you see it's marked LAH845?
 9 A Correct.
 10 Q Is that a document that you produced?
 11 A I -- our organization produced it.
 12 Q Okay. Do you recognize this document?
 13 A I do.
 14 Q You do?
 15 A Yes.
 16 Q And what is it?
 17 A It was like one of the first renditions that we were trying
 18 to put together to explain who and what we were.
 19 Q Okay.
 20 A We still have like the old logo up there, things like that.
 21 Q And was this document accurate?
 22 A In hindsight, no. We were -- this -- if I'm not mistaken,
 23 this was post Arno. And so after Arno left the Illinois
 24 organization, and we were still trying to figure out how to
 25 move forward as an organization. So it's not complete -- it's

1 not how we describe ourselves today, for sure.
 2 Q Sure. But --
 3 A Many of these things have disappeared off of our list.
 4 Q I apologize. Maybe I'm not clear. I'm sure I wasn't clear
 5 because you misunderstood me.
 6 A I'm sorry.
 7 Q I wasn't asking about is it accurate today.
 8 Was it accurate when it was written?
 9 A No.
 10 Q Oh, it wasn't accurate.
 11 A I don't think it was, no.
 12 Q Okay. And why wasn't it accurate?
 13 A There was a couple of things on here. Part of our
 14 explanation, here Christian mentioned some stuff as a cofounder
 15 but nobody else --
 16 Q Okay. Can we --
 17 A -- which that would have been inaccurate.
 18 MR. GEEKIE: Can we turn to that page?
 19 BY MR. GEEKIE:
 20 Q Okay. So is this what you're saying is inaccurate? That
 21 Christian is the cofounder?
 22 A In part. In part.
 23 Q Okay. Well --
 24 A Well, not that he's a cofounder, but that nobody else was
 25 listed as one. And I believe we produced emails where

1 Christian said we should all be calling and posting that as
 2 well.
 3 Q Oh, sure. That was later, though, right?
 4 A Not far after this.
 5 Q Okay. But in this, what this was intended to show was that
 6 Mr. Picciolini was a cofounder of Life After Hate, the entity
 7 that had been absorbed, right?
 8 A No. Of Life After Hate, the non-profit.
 9 Q Okay. So you were distinguishing between --
 10 A This was the non-profit Illinois.
 11 Q Can I finish?
 12 A Oh, sorry, sorry, sorry. Sure, sure.
 13 Q You were -- you distinguish now between the Illinois Life
 14 After Hate and the Wisconsin Life After Hate?
 15 A Always have.
 16 Q Okay. But the Illinois one you claim absorbed the assets
 17 of the Wisconsin company?
 18 A Yes.
 19 Q Did it absorb the trademark Life After Hate?
 20 A Yes.
 21 Q Okay. You would agree that Christian Picciolini was a
 22 cofounder of the Wisconsin corporation with Mr. Michaelis,
 23 right?
 24 A I know the history of that. I know that Arno granted him
 25 that, as well as others. But I wouldn't say that, if we were

Rangel - Cross by Geekie

Rangel - Cross by Geekie

1 going to, in fact, talk about the reality of it, I would say
 2 no.
 3 Q What happened to the Wisconsin corporation, if you know?
 4 A What happened to it?
 5 Q Yeah.
 6 A What do you mean?
 7 Q Is it -- what happened to it?
 8 A I believe it's dead in the water.
 9 Q Okay. Do you consider yourself an honest person?
 10 A Yes, sir.
 11 Q Is your testimony today honest?
 12 A Absolutely.
 13 Q Okay.
 14 MR. GEEKIE: Could we pull up the exhibit, please?
 15 (Counsel conferring.)
 16 MR. GEEKIE: May I approach with the hard copy?
 17 THE COURT: Yes. And you don't need to ask.
 18 MS. SAPER: What number exhibit is this?
 19 MR. GEEKIE: This isn't marked as an exhibit. This is
 20 for impeachment.
 21 I'll give you a hard copy, too.
 22 MS. SAPER: So you didn't provide this to us as one of
 23 the documents earlier?
 24 MR. GEEKIE: This is impeachment.
 25 BY MR. GEEKIE:

1 A Yes.
 2 Q And this was an application to reinstate the Wisconsin
 3 corporation, right?
 4 A That was not my understanding of this, no.
 5 Q Well, it says right on the top, "Application for
 6 Reinstatement, Non-Stock Corporation," correct?
 7 A You're -- this is -- you're taking this real out of
 8 context. So no, no, it's not correct.
 9 Q You're saying that it doesn't state, "Application for
 10 Reinstatement, Non-Stock Corporation"?
 11 A It does say that, yes.
 12 Q Okay. And this application for reinstatement, right below
 13 that, it's for the company called Life After Hate, Inc.,
 14 correct?
 15 A Correct.
 16 Q And that was the name of the Wisconsin corporation,
 17 correct?
 18 A I -- what I understand this document to be, when I was
 19 asked to fill it out, was so that we could pay payroll in
 20 Wisconsin, so we had to register ourselves in the State of
 21 Wisconsin to do business in Wisconsin. So it was at the behest
 22 of our current accountant to do this. So trying to resurrect
 23 the online journal corp.? No. I thought what we were doing
 24 was registering ourselves as working in the State of Wisconsin
 25 as the non-profit we are today.

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Rangel - Cross by Geekie

1 Q So you just testified that the Wisconsin corporation is
 2 dead in the water.
 3 A The journal? Yeah, absolutely.
 4 Q Okay. Now, would you turn to the second page of this
 5 document?
 6 A Yes.
 7 Q Do you see that this document -- do you recognize this?
 8 A Yes, I do.
 9 Q Is that your signature on the document?
 10 A It is.
 11 Q And was this an application for reinstatement of the
 12 Wisconsin corporation?
 13 A I believe this was -- I was asked to fill this out for our
 14 accountant so that we could -- because I live in Wisconsin, so
 15 that -- and I think this was for payroll purposes for -- for
 16 us -- registered business in Wisconsin --
 17 MR. GEEKIE: Your Honor, I move to strike as
 18 nonresponsive.
 19 THE COURT: Okay. No, I'm not going to strike for
 20 nonresponsive.
 21 And since you talked over each other, I don't know if
 22 we got a full answer.
 23 So ask your next question.
 24 BY MR. GEEKIE:
 25 Q This is your signature on the document, right?

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Rangel - Cross by Geekie

1 Q You didn't file a document for an out-of-state corporation
 2 to operate in Wisconsin, did you?
 3 A I don't know how to answer that. I'd have to ask my
 4 accountant. We were trying to operate legally, since I lived
 5 in Wisconsin.
 6 Q Okay.
 7 A I think we were required to do this, in fact. I think
 8 Wisconsin sent us --
 9 Q You were required by what?
 10 A Wisconsin, I believe -- maybe the Regulation and Licensing
 11 or whoever -- whoever we have to pay taxes and payroll to in
 12 Wisconsin required us to do that.
 13 So I remember when my accountant approached me and
 14 said: Hey, you aren't registered to do business in Wisconsin,
 15 you have to fill out these forms. And so we did that.
 16 Q Who is your accountant?
 17 A Mike Cuccia, CPA.
 18 Q Where is he located?
 19 A Racine, Wisconsin.
 20 Q And why didn't you file -- if you're claiming that Life
 21 After Hate, the Illinois corporation, had to pay the taxes --
 22 that's what you're saying, right?
 23 A Wisconsin payroll taxes.
 24 Q Okay. But this is -- you're saying the Illinois company,
 25 Life After Hate, had to operate it -- had to pay the Wisconsin

1 taxes, right?

2 A I believe so, yes.

3 Q Okay. But you didn't file an operating -- or an

4 application to operate in Illinois -- or in Wisconsin for the

5 Illinois corporation, did you?

6 A I thought that's what this would be.

7 Q This says it's reinstating the Wisconsin corporation,

8 doesn't it?

9 A Okay. So here's where my confusion, this leading to what

10 you're saying.

11 I tried to do this on my own before we had the --

12 before -- like when I first came on, I tried to -- I was told I

13 needed to register ourselves as -- there's some paperwork we

14 had to fill out so that I could pay payroll in Wisconsin for

15 myself.

16 I tried to do that myself.

17 When we then switched accountants, I screwed up,

18 couldn't get access to the site that I did that on. I did

19 something wrong. So what I thought this was is we're redoing

20 the application that I tried to fill out so that we could

21 operate in Wisconsin. So that's what this is about, and that's

22 what I thought this was about. But I don't know the legalities

23 of, like, the full explanation of what we registered and didn't

24 register. We were trying to operate legally in Wisconsin.

25 Q What's your -- what is your title with the Illinois Life

1 After Hate company? Executive director?

2 A I believe we've changed it to executive director at this

3 point.

4 Q Okay. And Mr. McAleer, is his title or position with the

5 Illinois company chairman of the board?

6 A I'd have to look at the records to know how to answer that

7 Q And if you look at the first page, you signed this document

8 March 22 of 2018, correct?

9 A Correct.

10 Q Just about a year ago, right?

11 A Correct.

12 Q And that was before you filed suit in this case?

13 A Correct.

14 Q And if you'll turn to the page that is the final page of

15 the document -- are you there?

16 A Yes.

17 Q And is that your signature at the bottom?

18 A Correct.

19 Q Okay. And is this your handwriting on the document?

20 A Yes.

21 Q And in this -- in this document, on this page, you list

22 Tony McAleer.

23 Do you see that?

24 A Yes.

25 Q You list him as president, correct?

1 A Correct.

2 Q That's not his title of the Illinois corporation, is it?

3 A Again, I'd have to look at the documents.

4 Q You list Sammy Rangel.

5 Do you see that?

6 A Yes.

7 Q Sammy Rangel is CEO.

8 Do you see that?

9 A Yes.

10 Q That's not your title for the Illinois corporation, is it?

11 A I'd have to look at -- again, I can't recall the specifics

12 of -- I'd have to look -- do you have the document I can look

13 at?

14 Q You just testified that you were the executive director.

15 A Correct.

16 Q Okay.

17 A You can interchangeably use that as CEO as well.

18 Q Now, at the top, the -- do you see the company underItem

19 No. where it has the company address?

20 A Yes.

21 Q And then up above that, there is Life After Hate, Inc.,

22 Arno Arr Michaelis, IV.

23 Do you see that?

24 A Yes.

25 Q Okay. So clearly -- and it shows that this is a non-stock

1 corporation, right above that.

2 Do you see that?

3 A I see it --

4 Q Right above "Life After Hate," it says "non-stock

5 corporation" --

6 A Yes.

7 Q -- correct?

8 Now, this -- Arno Michaelis -- Michaelis was listed

9 here because you knew that you were filling this out for the

10 Wisconsin corporation; isn't that true?

11 A I thought we were filling it out to operate in Wisconsin.

12 Q And going down to Box No. 1, you list -- you strike out the

13 address of the Milwaukee corporation, and you don't put in the

14 address of the Illinois corporation, do you?

15 A No. We needed a Wisconsin address.

16 Q Why do you say you needed a Wisconsin address?

17 A Part -- I think that's a part of the instructions.

18 Q Does it say that here? Does it say it must be a Wisconsin

19 address?

20 A I don't remember.

21 Q Your testimony a short time ago was you were trying to

22 register the Illinois company to pay taxes, right?

23 A No. My testimony was we were trying to pay payroll in

24 Wisconsin.

25 Q Yes. For the Illinois company, right?

1 A For my position, because I live in Wisconsin. There's like
 2 a bunch of accounting, legal stuff there.
 3 Q Now, your testimony was actually false, wasn't it, when you
 4 said that the Wisconsin corporation was --
 5 MR. GROTHOUSE: Objection, your Honor.
 6 THE COURT: It's overruled. He's trying to impeach.
 7 Go ahead.
 8 BY THE WITNESS:
 9 A No --
 10 BY MR. GEEKIE:
 11 Q Your testimony -- let me finish.
 12 A I believe it was honest --
 13 THE COURT: Hold on, hold on. There's not a full
 14 question, and I need to determine whether there's an impeaching
 15 question.
 16 Ask the question.
 17 BY MR. GEEKIE:
 18 Q Your testimony earlier that the Wisconsin corporation was
 19 dead in the water was false, wasn't it?
 20 A Not when I answered it. That was my belief.
 21 Q But you're --
 22 A That was my understanding.
 23 Q -- the one that prepared these documents that are marked
 24 here that has been introduced to you, right?
 25 A With the help of my accountant, yes.

1 MR. GEEKIE: What's the next number? The next exhibit
 2 number for us?
 3 Your Honor, I'd move for the admission of this
 4 document as Defendants' Exhibit 23 under the basis of a
 5 government record.
 6 THE COURT: Okay. Any objection to that?
 7 MR. GROTHOUSE: No objection.
 8 THE COURT: Okay. We'll put that in.
 9 (Said exhibit received in evidence.)
 10 THE COURT: Did you call it 23?
 11 MR. GEEKIE: Defendants' 23. That's the next one in
 12 order for us, Judge.
 13 THE COURT: Thank you.
 14 BY MR. GEEKIE:
 15 Q And you admit, don't you, that the Wisconsin corporation
 16 used the name "Life After Hate" before the Illinois
 17 corporation?
 18 A The online journal, yes.
 19 Q Does any document exist where the Wisconsin corporation
 20 transferred to the Illinois corporation the right to use "Life
 21 After Hate" as a trademark?
 22 A I don't -- I don't -- I don't know the answer to that.
 23 Q Have you ever seen a document where Arno Michaelis
 24 transferred any rights he would have in the term "Life After
 25 Hate," transferred those to the Illinois corporation?

1 A I don't know the answer to that.
 2 Q Have you ever seen a document where Christian Picciolini
 3 transferred any rights or interests he might have in the term
 4 "Life After Hate" to the Illinois corporation?
 5 A No, sir.
 6 Q Now, speaking of Arno Michaelis, you're familiar with his
 7 social media, aren't you?
 8 A With his social media?
 9 Q Yes.
 10 A Yes, sir. Somewhat.
 11 Q And he has -- he has a social media site, I think you
 12 testified earlier, that's called My Life After Hate, correct?
 13 A I believe so. I haven't looked at it in a long time.
 14 Q Your testimony was that Mr. Michaelis -- Mr. Michaelis
 15 wrote a book titled "My Life After Hate," right?
 16 A Did I say that?
 17 Q Yes. Do you recall testifying to that?
 18 A Well, I know he did write a book called "My Life After
 19 Hate," yes.
 20 Q Your testimony earlier was that he did -- he wrote that
 21 book and used that title before the Wisconsin company, Life
 22 After Hate, was founded.
 23 A I actually think that was the opening statement. I don't
 24 remember being asked to talk about that.
 25 Q Okay. The fact is that Mr. Michaelis wrote his book "My

1 Life After Hate" after the Wisconsin corporation named "Life
 2 After Hate" was founded, right?
 3 A I don't know. I know that he was done when I came on the
 4 scene.
 5 MR. GEEKIE: Can you pull up Defendants' 18?
 6 BY MR. GEEKIE:
 7 Q And I'm showing you what's marked as Exhibit 18.
 8 Do you have that in front of you now?
 9 A I think so, yes. My Life After Hate?
 10 Q Yes.
 11 A Yes.
 12 Q That's Mr. Michaelis' Facebook page, isn't it?
 13 A I believe so.
 14 Q You've seen that before, right?
 15 A Yes.
 16 MR. GEEKIE: Your Honor, I'd move for the admission of
 17 plaintiff's -- I'm sorry, Defendants' Exhibit 18.
 18 THE COURT: Okay. It will be admitted.
 19 (Said exhibit received in evidence.)
 20 BY MR. GEEKIE:
 21 Q And on that page, do you see that Mr. Michaelis uses a
 22 website that's called MyLifeAfterHate.com?
 23 A Yes, sir.
 24 Q You have heard people say, haven't you, that Mr. Michaelis'
 25 term "My Life After Hate" implies that he owns Life After Hate

1 by calling it "My Life After Hate"?
 2 A I've never heard that, no.
 3 Q You'd agree that the term "My Life After Hate" is very
 4 similar to the term "Life After Hate," wouldn't you?
 5 A It's similar. Not the same, but similar.
 6 Q And, in fact, you're aware, aren't you, that Mr. Michaelis
 7 is operating a business that's called "My Life After Hate"?
 8 A I don't know if it's a business, like, officially. But I
 9 know that he does use "My Life After Hate," yes.
 10 Q And he raises funds, doesn't he, under the -- under the
 11 term "My Life After Hate"?
 12 A I don't know. I think he's doing that under Serve 2 Unite,
 13 if I'm not mistaken, but I don't know.
 14 Q Okay.
 15 MR. GEEKIE: Can we turn to Exhibit 19?
 16 BY MR. GEEKIE:
 17 Q Do you have that in front of you?
 18 A I do.
 19 Q Is that also a page from Mr. Michaelis' Facebook site?
 20 A It appears so, yes.
 21 Q And you've seen this before, haven't you?
 22 A This particular page? Like the way it is right now?
 23 Q Yes.
 24 A No. I've been to his page. But to ask me if I've seen
 25 this point in time on his page, I -- I can't answer that.

1 Q Okay. If you go down to the bottom where it says -- do you
 2 see GoFundMe.com?
 3 A Yes.
 4 Q Do you see where it says "Click Here to Support My Life
 5 After Hate organized by Arno Arr Michaelis, IV"?
 6 A Can you make it bigger again?
 7 Q Do you see that?
 8 A Yes.
 9 Q Were you aware that Mr. Michaelis has a GoFundMe account
 10 that raises funds under the term "My Life After Hate"?
 11 A I think I was made aware of this.
 12 Q You were.
 13 A I believe so.
 14 Q Okay.
 15 MR. GEEKIE: I move for the admission of Defendant's
 16 19, your Honor.
 17 THE COURT: Okay. It will be admitted.
 18 (Said exhibit received in evidence.)
 19 BY MR. GEEKIE:
 20 Q And would you agree that Mr. Michaelis' use of the term "My
 21 Life After Hate" is confusingly similar to "Life After Hate"?
 22 A We've never had any issues of confusion with that. Not
 23 under my tenure.
 24 Q Do you -- do you know if -- do you have any reason or do
 25 you know whether or not you've lost donors to Mr. Michaelis and

1 his My Life After Hate site?
 2 A No knowledge of that.
 3 Q You haven't filed suit against Mr. Michaelis and his -- for
 4 his use of My Life After Hate, have you?
 5 A No.
 6 Q And is it because -- you haven't sued him because the
 7 term -- you believe the term "Life After Hate" has become
 8 generic?
 9 A Can you repeat that?
 10 MR. GROTHOUSE: Objection, your Honor. It calls for a
 11 legal conclusion.
 12 THE COURT: Only if he -- only if he didn't say it --
 13 I don't know if you're going to elicit that he said it.
 14 MR. GEEKIE: I asked -- and I'll repeat my question,
 15 and that is:
 16 BY MR. GEEKIE:
 17 Q Have you not sued Mr. Michaelis because you believe -- Life
 18 After Hate believes that the term "Life After Hate" has become
 19 generic?
 20 A Absolutely not. We haven't sued him because we try to
 21 honor him as the -- this was Arno's baby. This was Arno's
 22 mission. This was his vision. We don't have issues with Arno
 23 using "My Life After Hate." And there's no confusion. We
 24 don't get asked the same questions that we do in other
 25 situations. We never have, to my understanding.

1 Q So you're selectively enforcing your trademark; is that
 2 right?
 3 A That's not our trademark. "My Life After Hate" is not our
 4 trademark.
 5 Q "Life After Hate" is.
 6 A "Life After Hate" is, as well as "ExitUSA."
 7 Q Now, you yourself, Mr. Rangel, do you do speaking
 8 engagements?
 9 A Yes, sir.
 10 Q And do you do speaking engagements on behalf of Life After
 11 Hate?
 12 A Yes, sir.
 13 Q When you speak, do you identify yourself as the executive
 14 director of Life After Hate?
 15 A If I'm speaking for Life After Hate, yes. In most
 16 occasions, I would, yes.
 17 Q Okay. And you also have a company called Life Tech, right?
 18 A Correct.
 19 Q And you do speaking engagements for Life Tech, right?
 20 A Under Life Tech, not for Life Tech.
 21 Q Under Life Tech.
 22 A I am Life Tech, yeah.
 23 Q Okay. And you get paid for those engagements?
 24 A Sometimes.
 25 Q And when you speak under Life Tech or for Life Tech, you

1 also identify yourself as the executive director of Life After
 2 Hate, don't you?
 3 A If it's relevant, yes. I've been speaking since 1997.
 4 Q Life After Hate hasn't instructed you to stop speaking in
 5 competition with -- for Life Tech with Life After Hate, has it?
 6 A Who told you that?
 7 Q I'm asking you. Life After Hate hasn't told you to stop,
 8 has it?
 9 A No.
 10 Q And if you speak for Life Tech and get paid, that money
 11 could otherwise go to Life After Hate if you were speaking
 12 under the Life After Hate banner, right?
 13 A If that's what -- if that's -- if that's who -- if they
 14 were hiring Life After Hate to speak, it would go to them. If
 15 they were asking me to speak personally, it would go to me, as
 16 it has been for the last 20 years.
 17 Q Now, Life After Hate -- I'm sorry, let me start over, just
 18 so we're clear.
 19 Formers are people who were -- are called that because
 20 they were former members of extremist groups, right?
 21 A Yes.
 22 Q Just want to be sure we were talking about the same thing.
 23 And --
 24 A It's also used in another context where we're also talking
 25 about previous criminality, not just hate group.

1 Q Okay. And Life After Hate, one of its principal operations
 2 or services is to assist formers, correct?
 3 A Correct.
 4 Q And that's "formers" with an O.
 5 And you also run a business called Formers Anonymous,
 6 don't you?
 7 A It's not a business. It's a 12-step group.
 8 Q Okay. It's a 12-step group.
 9 And in it you provide counseling to formers, right?
 10 A No. It's a 12-step group. It's not a counseling group.
 11 Q Okay. You assist formers.
 12 A We support formers. We would say we support formers.
 13 Q And you're doing the same type of services that Life After
 14 Hate does for formers.
 15 A No, it's completely different.
 16 Q How is it different?
 17 A It's a 12-step group.
 18 Q Provides assistance to those formers, right?
 19 A It's a support group, like people come and talk about their
 20 problems and then go home.
 21 Q And Life After Hate provides support services, too, to
 22 formers, doesn't it?
 23 A Support services and a support group that is not based on
 24 the 12 steps.
 25 Q Has Life After Hate told you to stop providing services to

1 formers through Formers Anonymous?
 2 A No. In fact, I lend -- I lend any resources that F.A. can
 3 have towards them if they want them.
 4 Q In conjunction with operating Formers Anonymous, you hold
 5 yourself out as the executive director of Life After Hate,
 6 don't you?
 7 A Say that again? In conjunction with what?
 8 Q Providing service to formers through Formers Anonymous, you
 9 do hold yourself out as the executive director of Life After
 10 Hate, don't you?
 11 A One has nothing to do with the other.
 12 Q You hold yourself out, though, don't you?
 13 A I don't know what you mean by that.
 14 Q You tell people that you're the executive director of Life
 15 After Hate.
 16 A At Formers Anonymous?
 17 Q Yes.
 18 A It rarely comes up. I'm not there as the executive
 19 director. I'm there as Sammy. I started this group before I
 20 took on the position with Life After Hate.
 21 MR. GEEKIE: Could you pull up Plaintiff's Number 27?
 22 I'm getting close to being done, your Honor.
 23 THE COURT: Okay. Because I have to break for the
 24 3:00 o'clock.
 25 (Counsel conferring.)

1 MR. GEEKIE: Would you find it on this where it says a
 2 volunteer?
 3 (Pause in proceedings.)
 4 MR. GEEKIE: Do you have it there?
 5 BY MR. GEEKIE:
 6 Q Do you have -- this is Exhibit 27 that was admitted earlier
 7 and you testified about it.
 8 Do you recall this?
 9 A I do.
 10 Q And this is your exchange of tweets with -- with
 11 Mr. Piccolini back in August of 2017, right?
 12 A Text messages.
 13 Q Texts, okay.
 14 And we've turned to the third page. And I'll
 15 represent to you that the previous pages show this
 16 communication took place on August 23rd.
 17 Is that your recollection of when this happened?
 18 A Yes, sir.
 19 Q And that was the day that Mr. Piccolini left, either he
 20 was terminated or he resigned, right?
 21 A He was terminated.
 22 Q Okay. And what you say here -- and this is your comment,
 23 right?
 24 "But just so you know," that's you?
 25 A Yes, sir.

Rangel - Cross by Geekie

1 Q And it says, "But just so you know, you are not contracted
2 with us."
3 That means that Mr. Picciolini didn't have a contract
4 with Life After Hate?
5 A Correct.
6 Q And it says, "Do not have employee contract on file."
7 That's correct?
8 A Correct.
9 Q And it says, "You are a volunteer," correct?
10 A Correct.
11 Q And you had "staff privileges as a volunteer," correct?
12 A Correct.
13 Q Mr. Picciolini, just so we're clear, he was a volunteer at
14 Life After Hate, not an employee, correct?
15 A He had many roles, but all of us up until 2017 were
16 volunteering our time.
17 I think Angela might have been getting a small stipend
18 for her services, but basically everyone was working for free
19 at the organization.
20 Q Now, did Mr. Picciolini ever sign, in the course of his
21 volunteer work, did he ever sign a document that said that he
22 would transfer anything he created, like "Life After Hate"
23 trademark or "ExitUSA" trademark to Life After Hate?
24 A I'm probably not the best one to answer that question. I
25 don't know for sure, for certain.

1 You -- I told him based on your behavior, previous and now,
2 you're terminated. And he knew what those were because I had
3 numerous email conversations with him about that. I was very
4 specific in those emails that I produced to you and my team.
5 Q In fact, the behavior was that for several months he had
6 been complaining about the conduct of Mr. McAleer and you and
7 Ms. King, right?
8 A That -- that started once we tried to hold him accountable,
9 yes.
10 Q Okay. So he had complaints, too, right?
11 A Yes. Of being held accountable.
12 Q And he had been complaining for six months about some of
13 the things that the three of you had done.
14 A Like I mentioned, this was a long buildup.
15 Q And the three of you -- McAleer, King, and Rangel -- you
16 circled the wagons and decided that you would get Picciolini
17 out of the organization, right?
18 A Well, Angela is not a part of the administration, so, no,
19 Angela did not.
20 As the executive director, I -- we took a number of
21 steps to try to reconcile, to reel in his behavior. We went so
22 far as to have -- we hired a psychologist or psychiatrist to do
23 a mediation. We went through many steps, including the board.
24 The board meeting in April was a part of reconciling those
25 major concerns and differences. But the behaviors did not stop

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Rangel - Cross by Geekie

1 Q Okay. You talked about all these bad things that
2 Mr. Picciolini did, these horrible things, just terrible
3 things, but nowhere in this -- in this exchange of emails are
4 they mentioned, are they?
5 A No, those would precede these messages.
6 Q Pardon me?
7 A Those -- those messages being specific about his behavior
8 precede these messages.
9 Q Those precede.
10 A Yes.
11 Q You didn't introduce any of those messages about this
12 horrible conduct, did you?
13 A Introduce to where?
14 Q Today. Did you -- were there any --
15 A I've produced it.
16 Q Were there any emails today that said, "Christian, you've
17 disclosed client names contrary to our -- to our procedures"?
18 A I did not show those emails that we've produced to you
19 today, no.
20 Q The day you were terminating him, in these very hot,
21 contentious texts, you didn't say to him, "You did these
22 horrible things, you're gone," did you?
23 A I -- I did say that.
24 Q Where does it describe these horrible things that he did?
25 A Well, no, you -- well, I'm trying to answer your question.

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Rangel - Cross by Geekie

1 and almost immediately picked up when we returned from that
2 board meeting.
3 So the six months that you're talking about was -- was
4 often violation after violation after violation and trying to
5 work that out amicably with him, giving him direction, giving
6 him the proper guidance, the proper supervision to change those
7 behaviors, and he would not.
8 Q And yet, despite all of this exchange of information and
9 things, you don't have a single email to back up your claims,
10 do you?
11 A I do. I've produced all of that for you upon your request.
12 MR. GEEKIE: Could we turn to Exhibit -- Defendants'
13 Exhibit 59 -- Defendants' Exhibit 8, please?
14 BY MR. GEEKIE:
15 Q Do you see that document?
16 A Can you blow it up? I do see it, though. It's just
17 hard -- it's a little small for me.
18 Thank you.
19 MR. GEEKIE: Your Honor, I think this was already
20 admitted by plaintiffs, but I'll -- I'll move for the admission
21 of Defendants' Exhibit 8.
22 THE COURT: Okay. Any objection?
23 MS. SAPER: No, your Honor.
24 MR. GROTHOUSE: No, your Honor.
25 THE COURT: It will be admitted.

Rangel - Cross by Geekie

1 (Said exhibit received in evidence.)
2 BY MR. GEEKIE:
3 Q This is -- this is the cease and desist letter that you
4 testified about earlier, right?
5 A I believe so, yes, sir.
6 Q Okay. And it's dated November 13th of 2017, right?
7 A Correct.
8 Q And Life -- so Life After Hate informed Mr. Picciolini's
9 attorney, Mr. Kuo, that Mr. Picciolini was infringing on the
10 trademarks and doing other bad things in November of 2017,
11 correct?
12 A Well, the last paragraph talks about the unlawfully holding
13 himself out, about ExitUSA.
14 Q Yeah, this -- this put Picciolini on notice that Life After
15 Hate said he was infringing, correct?
16 A I believe so, yes.
17 Q And this is in November of 2017, but you didn't sue until
18 October of 2018, did you?
19 A No.
20 Q You waited a whole year.
21 A We did not sue until we sued. I mean --
22 Q Yeah.
23 A I don't know if we were waiting --
24 Q You testified earlier about all these bad things that were
25 happening.

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Rangel - Cross by Geekie

1 A Yes, sir.
2 Q But you waited a year to take legal recourse? Is that
3 right?
4 A Well, legal recourse started when we filed the cease and
5 desist. And that doesn't mean we were complacent before we
6 filed the lawsuit when we filed it. We were quite active,
7 actually, and really trying to do things quietly.
8 Q So you let -- you let all these bad things happen for a
9 year, and then you sued?
10 A No. We fired him.
11 Q Well, you fired him prior to this letter.
12 A Correct.
13 Q You fired him in August.
14 A Correct.
15 Q Then you sent a letter in November. And then you didn't
16 sue him for a year.
17 A Correct. That's accurate.
18 Q And during the year, all these bad things were happening,
19 and you took no legal recourse.
20 A We took a lot of recourse. We -- again, like I mentioned,
21 we -- we were appealing to Facebook, appealing to Twitter,
22 appealing to YouTube. We had interviews with law enforcement
23 to try to understand what our recourse might be with the
24 evidence that we had. So we did a number of things. And we
25 had legal counsel's guidance almost that entire time.

Rangel - Cross by Geekie

1 THE COURT: Okay. Stop right there.
2 Apparently my 3:00 o'clock was 3:00 o'clock Eastern
3 time, so I'm going to try to catch the last 10 minutes of it.
4 We'll take a 15-minute break.
5 But that means we will not need to stop at 3:00.
6 Okay?
7 MR. GEEKIE: Okay.
8 LAW CLERK: All rise. Court is in recess.
9 (Recess taken from 2:50 p.m. to 3:16 p.m.)
10 (Proceedings heard in open court:)
11 THE COURT: Okay. Sir, you can take the witness stand
12 again.
13 (Witness resumes the stand.)
14 MR. GEEKIE: Your Honor, another housekeeping matter.
15 THE COURT: Okay.
16 MR. GEEKIE: Counsel for both sides, we were just
17 wondering how late we might go today or when we might --
18 THE COURT: We can go until 5:00 now, now that I don't
19 have a break for a call since I messed up my time zone.
20 MR. GEEKIE: I'm sorry if we contributed to that,
21 Judge.
22 THE COURT: No, it was just --
23 (Brief interruption of the proceedings.)
24 THE COURT: Alex, do you need a few more minutes?
25 TECHNICIAN: I need like 10 seconds.

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Rangel - Cross by Geekie

1 THE COURT: Oh. Well, that I can give you.
2 (Pause in proceedings.)
3 THE COURT: Thank you, Alex.
4 TECHNICIAN: You're welcome.
5 THE COURT: Appreciate it.
6 So 5:00 o'clock.
7 MR. GEEKIE: Thank you.
8 BY MR. GEEKIE:
9 Q Mr. Rangel, during the break I saw you talking to your
10 attorney, and he was holding his notepad and talking to you and
11 gesturing.
12 Was he coaching you about your testimony?
13 A No.
14 Q Was he --
15 A I don't -- I don't know what you mean by "coaching," but I
16 would say no.
17 Q Did you -- did you discuss with him your testimony on the
18 stand?
19 A No, sir.
20 Q We were talking about your attorney's letter, the cease and
21 desist letter from Mr. Sipchen. And I think your testimony
22 earlier was that there were ongoing problems after the letter.
23 There were problems with controlling the YouTube page, right?
24 A YouTube, Twitter, our ExitUSA page.
25 Q Those were ongoing issues, correct?

1 A Correct.

2 Q And you didn't have your attorney send another cease and

3 desist letter saying these things are still going on, did you?

4 A I don't recall. I'm not sure how to answer that.

5 Q There was just one cease and desist letter, right?

6 A I believe so, yes.

7 Q And then Life After Hate went dead silent for a year with

8 respect to contacting Mr. Picciolini, right?

9 A I'm not sure if that's true. I don't -- I'm not sure. I

10 honestly can't recall all the actions we took.

11 Q Now, one of the primary -- I think we talked about this --

12 but one of the primary things that Life After Hate does is

13 provide exit services or services -- interventions and services

14 to formers, right?

15 A Correct.

16 Q And so who does Life After Hate consider the consumers of

17 its services or products?

18 A Well, we have the general public. We have men and women

19 still in hate groups that reach out to us. And we would also

20 say there are academics and researchers who are. Federal

21 government.

22 Q Okay. Anything else?

23 A I'm sure, but that's just a general list.

24 Q Okay. Anything else?

25 You're the executive director. You know who your

1 consumers are, right?

2 A I just -- I just gave an example. Yes, sir.

3 Q Okay. Anything else?

4 A I don't know how else to answer your question.

5 Q None others that you can think of right now.

6 A Correct.

7 Q All right. Let's turn to Life After Hate Exhibit 28,

8 Plaintiff's 28, which you testified to about earlier.

9 Now, these are the exchange of emails that you had

10 with Mr. Picciolini on August 23rd, correct?

11 A Correct.

12 Q And nowhere in these emails did you tell Mr. Picciolini

13 that he was doing all these bad things, did you?

14 A No, that was not the point of these emails.

15 Q And then let's go to Life After Hate No. 8. This is one

16 that you testified to about before, like Exhibit 28, and it's

17 already been admitted.

18 And this is -- this begins with the email from

19 Mr. Picciolini to you, right?

20 A At my personal email, yes.

21 Q Okay. And in it, Mr. Picciolini is the first one to

22 propose let's announce that I'm leaving, right?

23 A I don't understand your -- is this the first time it's come

24 up at all? Or is that what he says in this email?

25 Q August 23rd. Do you see the date?

1 A Uh-hum.

2 Q That's the date that you claim you were terminating him,

3 right?

4 A Correct.

5 Q And Mr. Picciolini says in this email that he proposes, as

6 you look in the second paragraph, "In the statement, we can say

7 it was a strategic decision on both our parts so that" -- no,

8 further down.

9 "In the statement, we can say it was a strategic

10 decision on both our parts so that each business could focus on

11 what they do best in a way that doesn't dilute or compromise

12 the other."

13 Do you see that?

14 A Yes.

15 Q He then offers to "feed people to your network as you see

16 fit," doesn't he?

17 A He does.

18 Q And you declined that offer, didn't you? Life After Hate

19 did.

20 A Yes.

21 Q And you testified earlier about Life After Hate and this

22 confusion with Picciolini.

23 Life After Hate could have issued its own press

24 release that Picciolini had left, right?

25 A Correct.

1 Q But you didn't do that, did you?

2 A No, sir.

3 Q The reason you didn't do it was because Picciolini had just

4 raised \$800,000, and you didn't want to jeopardize that

5 fundraising, correct?

6 A Who stated that?

7 Q Picciolini raised \$800,000 for Life After Hate at this

8 time, right?

9 A No. Life After Hate raised that money. The organization

10 did.

11 Q Picciolini had led the fundraising effort, right?

12 A He was gone for most of that.

13 Q And, in fact, Picciolini was the figurehead. He was the

14 one who everybody knew as Life After Hate. And that's why the

15 money came in.

16 A You said that before, and I said I disagreed.

17 Q Okay. And the real reason that Life After Hate wouldn't

18 issue any kind of a press release was that they didn't want

19 people to know that Picciolini had left; isn't that right?

20 A How would you know that? Like I don't even know where

21 you're --

22 Q Did you issue a press release?

23 A No.

24 Q You could have issued a press release, right?

25 A Yes.

1 Q You chose not to issue a press release.
 2 A Yes.
 3 Q You wanted to keep it secret that Picciolini had left,
 4 right?
 5 A That's your opinion. That's not what I'm testifying to.
 6 Q If Life After Hate had issued a press release that
 7 Picciolini had left, all of the confusion with consumers could
 8 have been avoided, right? Because they would have known he was
 9 gone.
 10 A I don't know what you're -- I'm not following your
 11 questions. Can you say that again?
 12 Q If Life After Hate issued a press release, all of your
 13 consumers would have known that Picciolini was gone and had
 14 left the company, right?
 15 A Possibly, yes. More people would have known.
 16 Q More people would have known.
 17 Yet Life After Hate turned down Picciolini's offer to
 18 issue a press release, right?
 19 A Yes, we did.
 20 Q And you didn't issue one on your own, even though you could
 21 have, right?
 22 A Correct.
 23 Q Okay.
 24 MR. GEEKIE: I have no more questions.
 25 THE COURT: Okay. Redirect.

1 MR. GROTHOUSE: Thank you, your Honor.
 2 REDIRECT EXAMINATION
 3 BY MR. GROTHOUSE:
 4 Q I would like to direct your attention, Mr. Rangel, to
 5 Defendant's Exhibit Number 11.
 6 A It's not on the screen. Do I have that?
 7 MR. MONACO: I'm on the HDMI.
 8 THE COURT: Okay, hang on just a second.
 9 THE WITNESS: Can I use that?
 10 THE COURT: Oh, sure, you can use that.
 11 Is it working for you now?
 12 MR. MONACO: Yes, thank you.
 13 THE COURT: Okay.
 14 MR. GROTHOUSE: That's not it. Number 11.
 15 MS. SAPER: Defendants' Exhibit 11.
 16 MR. MONACO: Defendants' Exhibit 11. Excuse me.
 17 BY MR. GROTHOUSE:
 18 Q Do you see it now, Mr. Rangel?
 19 A I can, yes.
 20 Q And you mentioned and admitted before that you are familiar
 21 with this email chain?
 22 A Correct.
 23 Q And this email conversation?
 24 A Yes.
 25 Q I direct your attention to this first email sent Wednesday,

1 July 6th, 2011, by Mr. Christian Picciolini.
 2 Is that your email included in this address to?
 3 A Yes.
 4 Q The Sammy Rangel@yahoo.com?
 5 A Correct.
 6 Q Let me direct your attention to the content of the email,
 7 particularly the first paragraph.
 8 Can you please read the first paragraph?
 9 A It's the --
 10 Q Starting with the second sentence, please.
 11 A Sure.
 12 MR. GEEKIE: Objection. The document speaks for
 13 itself.
 14 THE COURT: Okay. So this is really what I want you
 15 to be able to do, is you elicit the testimony from him and
 16 corroborate it with your document.
 17 MR. GROTHOUSE: Sure.
 18 THE COURT: Okay?
 19 MR. GROTHOUSE: Sure.
 20 THE COURT: Sustained.
 21 BY MR. GROTHOUSE:
 22 Q So, Mr. Rangel, in this email, Christian Picciolini
 23 referred to the 501(c)(3) as "our" 501 -- 501(c)(3).
 24 A Correct.
 25 Q What is your understanding of the word "our" meant, by his

1 use of it?
 2 A It's what I've always understood it, that it's all of our
 3 efforts to do this together, to start the Illinois non-profit.
 4 Q Mr. Picciolini also mentioned, quote, unquote, core group.
 5 Who was part of this core group?
 6 A I believe he mentioned himself, Arno, myself, Frankie,
 7 Tony, and Angela as well.
 8 Q And at the bottom, he mentioned that he's honored to be in
 9 your company. Correct?
 10 A Yes, sir.
 11 Q Thank you.
 12 Mr. Rangel, let me direct your attention to your
 13 knowledge of the Wisconsin entity, particularly Exhibit Number
 14 23.
 15 MR. GROTHOUSE: We don't actually have that, your
 16 Honor.
 17 THE COURT: Okay. Do you have the Exhibit 23? Yours?
 18 MR. GROTHOUSE: This is the addition that was made.
 19 MR. GEEKIE: Defendant 23.
 20 THE COURT: If you have Defendants' 23, I'll switch it
 21 over to you.
 22 Is it Defendants' 23?
 23 There, how is that?
 24 Thank you.
 25 MR. GROTHOUSE: Do you have the last page of that?

1 BY MR. GROTHOUSE:
 2 Q Mr. Rangel, after Life After Hate, the Illinois non-profit,
 3 formed in 2011, what happened to the Wisconsin entity?
 4 A As far as I know, it just -- it just died off. It was
 5 left -- it was just left alone.
 6 Q So to your knowledge, did this entity ever -- did it
 7 continue operating after the Life After Hate organization --
 8 A Not in any capacity I was aware of, no, sir.
 9 Q And, in fact, the very exhibit that the defendants have
 10 pointed out, if you see at the last page, it says "Delinquent
 11 1/1/2012," correct?
 12 A Yes.
 13 Q So to clarify, in all -- based on everything that you've
 14 seen, heard, while you were a member of Life After Hate, the
 15 Wisconsin entity ceased to operate after Life After Hate was
 16 formed.
 17 A Correct.
 18 Q And it wasn't until 2018 that you filled out this
 19 paperwork, correct?
 20 A Correct.
 21 Q And what was your intention in filling out this paperwork?
 22 A I thought I was being instructed to re-register, to operate
 23 legally in Wisconsin, since I lived in Wisconsin, so that we
 24 could pay payroll taxes in Wisconsin, because I remember there
 25 was accounting issues, and the accountant said you have to redo

1 this, and I -- so I re-did this.
 2 Q Mr. Rangel, you're not a lawyer, are you?
 3 A No, sir.
 4 Q And you're not an accountant.
 5 A No, sir.
 6 Q Correct?
 7 A Correct.
 8 Q Okay. So you filled out this -- this application because
 9 you were told that you lived in Wisconsin and you wanted -- and
 10 you needed to fill out this for payroll in Wisconsin, correct?
 11 A Correct. I thought I had went to a website and filled out
 12 a form to be able to -- to be able to live and work in
 13 Wisconsin. I thought I screwed that up. The accountants
 14 couldn't find what I did, so they asked me to redo it. Sent me
 15 this package. Filled out the package. Asked questions. And
 16 then submitted the package.
 17 Q Thank you, Mr. Rangel.
 18 Let me ask you about Arno Michaelis.
 19 Based on your knowledge, Arno was the creator of the
 20 original Life After Hate website, correct?
 21 A Yes.
 22 Q And he wrote the book "My Life After Hate."
 23 A Correct. That's his life story.
 24 Q And so after you -- he left or was terminated from Life
 25 After Hate, the Illinois non-profit, in I believe 2012,

1 correct?
 2 A Yes, sir.
 3 Q Did Life After Hate, the non-profit, have any issue with
 4 Arno continuing to promote his book?
 5 A Absolutely not. That was his book.
 6 Q And did Life After Hate, the entity, then or now have any
 7 issue with -- with Arno promoting his book and any derivative
 8 works such as movies?
 9 A No. It's his life story. We don't own the rights to that.
 10 Q Okay. And Mr. Arno also is in charge of another
 11 organization, correct?
 12 A I believe it's called Serve 2 Unite.
 13 Q What does Serve 2 Unite do?
 14 A I believe they do a lot of public speaking, outreach at
 15 schools, character development stuff. A lot of very similar
 16 stuff to like what he was trying to do when he had his journal
 17 where he was out there telling his story, trying to get kids to
 18 change their lives. For the most part, that's what I see them
 19 doing.
 20 Q So you don't believe there's any -- you've never had any
 21 confusion between Serve 2 Unite and Life After Hate, correct?
 22 A No, sir.
 23 MR. GEEKIE: Objection. Relevance and foundation.
 24 THE COURT: Okay. I don't know if his confusion is
 25 necessarily helpful, so -- but it's on the record. I'm not

1 going to strike it. Thank you.
 2 BY MR. GROTHOUSE:
 3 Q Nobody has reached out to you or to any -- and to your
 4 knowledge anybody at Life After Hate confused or asking about
 5 Serve 2 Unite, correct?
 6 A No, sir.
 7 MR. GEEKIE: Objection. That's not an issue in this
 8 case.
 9 MR. GROTHOUSE: Your Honor, it is an issue --
 10 THE COURT: Please don't argue. Please. It's Friday
 11 at 3:33.
 12 The answer is out. I am completely capable of
 13 listening to it and applying the law.
 14 So ask your next question.
 15 BY MR. GROTHOUSE:
 16 Q So Life After Hate, the organization, the non-profit
 17 Illinois organization, is okay with Arno providing services
 18 under Serve 2 Unite.
 19 A We have no issue with it, no, sir.
 20 Q And the services that he provides are?
 21 A Correct, no --
 22 MR. GEEKIE: Objection. Foundation.
 23 BY MR. GROTHOUSE:
 24 Q What are the services that Arno provides under --
 25 A From what I can tell --

1 MR. GEEKIE: Same objection. Foundation, your Honor.
 2 THE COURT: Okay. So it's sustained. It's a time
 3 frame issue, so you need to lay the foundation.
 4 BY MR. GROTHOUSE:
 5 Q Currently, Arno is providing services under Serve 2 Unite,
 6 correct?
 7 A I believe so, yes.
 8 Q And to your knowledge, what are those services?
 9 A A lot of it seems to be on school presentations --
 10 MR. GEEKIE: Foundation again, your Honor.
 11 THE COURT: I'm sorry?
 12 MR. GEEKIE: Foundation again, your Honor.
 13 THE COURT: Okay. So now it's a question of whether
 14 or not -- how he has this awareness, so sustained.
 15 Lay the foundation.
 16 MR. GROTHOUSE: Very well.
 17 BY MR. GROTHOUSE:
 18 Q Mr. Rangel, you are familiar with Serve 2 Unite, correct?
 19 A Correct.
 20 Q And --
 21 THE COURT: How are you familiar with it?
 22 BY MR. GROTHOUSE:
 23 Q How are you familiar with Serve 2 Unite?
 24 A In August of 2012, I believe, there was an Oak Creek
 25 shooting by a white supremacist who walked into a Sikh temple

1 killed a number of people. The father of that group had two
 2 sons named Armadeep and Pardeep. When I learned about the
 3 shooting, I went to the shooting. The next day I went to the
 4 vigil. I met the brothers, Armadeep and Pardeep, the sons of
 5 the temple leader that was killed. Introduced them to Life
 6 After Hate, and as a result introduced them to Arno.
 7 From there, Arno and Pardeep established their --
 8 acting as a perpetrator of white supremacy violence and a
 9 victim of white supremacy violence, they -- they organized
 10 under the Serve 2 Unite title together and would go around
 11 talking about issues related to forgiveness and reconciliation,
 12 violence, victims, and do a lot of what they call character
 13 development for youth in high schools. That's what I'm aware
 14 of that they primarily do. But, of course, people reach out to
 15 them for other things.
 16 Q All right. Thank you.
 17 Let me direct your attention to Life After Hate, the
 18 Illinois non-profit, their enforcement efforts for their mark,
 19 particularly against Mr. Picciolini.
 20 You mentioned that shortly after Mr. Picciolini was
 21 terminated, he started to use the mark and started to redirect
 22 consumers using the ExitUSA.org domain name to his personal
 23 website, correct?
 24 A Correct. And he also hacked our Facebook page twice and
 25 took over the ownership of those websites on two separate

1 occasions.
 2 Q Mr. Rangel, for -- just for this particular question, when
 3 did you -- when -- excuse me.
 4 When did Life After Hate, the Illinois non-profit,
 5 retain counsel?
 6 A I believe it was around the time we started looking at the
 7 trademarks, so a couple of months after -- after we let
 8 Christian go.
 9 Q And when did the organization Life After Hate non-profit
 10 submit the applications for trademarks, to your memory?
 11 A I'm going to say -- I don't remember the exact month, but
 12 it was --
 13 Q That's okay.
 14 A -- end of 2017, maybe end of fall.
 15 Q And do you remember when -- and do you remember when those
 16 trademarks were registered?
 17 A The end of 2017, I believe, or the application was in and
 18 then I believe early 2018 the actual permission was given or
 19 the -- however you word that, the trademarks were given or
 20 awarded.
 21 Q That's okay.
 22 So during this time, you were waiting on the
 23 trademarks to be registered, correct?
 24 A Correct.
 25 Q And what did you think would happen after the trademarks

1 would be registered?
 2 A I thought that would put an end to all of this -- I thought
 3 it would be enough to turn the page, move on, regain our Exit,
 4 all our Exit different sites and platforms, eliminate the
 5 confusion.
 6 Q So it's safe to say that you thought you would be in a
 7 stronger position once those trademarks were registered --
 8 MR. GEEKIE: Objection. Leading.
 9 THE COURT: Okay. It is leading.
 10 You're supposed to stand.
 11 MR. GEEKIE: I apologize, your Honor.
 12 THE COURT: That's all right.
 13 It's sustained.
 14 BY MR. GROTHOUSE:
 15 Q Mr. Rangel, once you -- what -- so you said that you
 16 believe once the registrations accrued that you would be able
 17 to -- that it would be the end of all the issues that you had
 18 with Mr. Picciolini.
 19 Why do you think that that would be?
 20 A Because I thought it would mean we would be able to reclaim
 21 one for one, go to these platforms and show the ownership and
 22 the paper trail that we have so that they could turn them back
 23 over to us, forcefully. And then we knew that moving forward
 24 now we -- we were scrambling trying to get all our assets in
 25 order to protect ourselves from any further harm. So we knew

1 that doing this would put us in the position to do that.
 2 Q Mr. Rangel, do you believe that Mr. Picciolini is a very
 3 strong personality?
 4 A Yes.
 5 Q Do you believe that he's very determined?
 6 A Yes.
 7 Q After you sent the cease and desist letter -- excuse me,
 8 Life After Hate sent the cease and desist letter to
 9 Mr. Picciolini and you received the response that you did, did
 10 you believe that Mr. Picciolini was just going to change his
 11 mind all of a sudden?
 12 A No, sir.
 13 Q So you knew what his position was.
 14 A Yes, sir.
 15 Q And after that, you were just trying to register your
 16 marks.
 17 A Correct.
 18 MR. GEEKIE: Objection. Leading.
 19 THE COURT: Sustained.
 20 BY MR. GROTHOUSE:
 21 Q Mr. Rangel, you -- the defendants mentioned a press
 22 release. We went over that during the direct testimony.
 23 Do you remember, without looking at-- having to go
 24 back and look at the documents, do you remember all of the
 25 conditions of that press release?

1 A Yes, for the most part.
 2 Q Can you recite those?
 3 A That there was going to be, like, this unified separate --
 4 you know, this mutual separation in exchange of \$50,000 and
 5 work a -- a working relationship after the separation if we let
 6 him spin off ExitUSA. And we -- we did our separate prevention
 7 unrelated to ExitUSA on our own.
 8 Q I notice some of the language in these messages was quite
 9 strong. Would you agree with that characterization?
 10 A To the very least, yes.
 11 Q So after Mr. Picciolini pitched this press release and you
 12 disagreed or rejected it, did you believe that there was any
 13 possibility that you could thereafter magically agree to a
 14 press release afterwards?
 15 A No, sir.
 16 Q Just to clarify, Mr. Rangel, I know that you're not going
 17 to be familiar with all the services that you provide, but can
 18 you just, for the record, just to clarify, talk about all the
 19 services that Life After Hate currently provides?
 20 A A lot of supportive listening, social service type
 21 supports. We're doing crisis intervention. We're doing
 22 resource and referrals. Oftentimes, we have to try to connect
 23 people with attorneys or other organizations. Law enforcement.
 24 We -- and, you know, we might even provide like ongoing
 25 listening services. Like we have multiple conversations with a

1 person until they decide whether they want to move forward with
 2 us or move in a different direction. We're presenting to
 3 academics, to researchers, to law enforcement, to NGOs, to
 4 communities, to, you know, mom-and-pop shops that are looking
 5 for answers and help. We provide interviews to help explain
 6 how to combat this type of hatred as well as how to respond if
 7 you're a victim of that. On and on.
 8 Q Do -- does the organization provide services to schools?
 9 A Yes.
 10 Q Does the organization seek government grants?
 11 A We have, yes.
 12 Q Does the organization work with research institutions?
 13 A Yes.
 14 Q Does the organization work with formers, as been defined?
 15 A Yes.
 16 Q Does the organization work with current members of gangs or
 17 organizations or current criminals?
 18 A Yes.
 19 Q Does the organization put -- anybody from the organization
 20 give speeches and presentations?
 21 A Many.
 22 MR. GROTHOUSE: That's all, your Honor. Thank you.
 23 THE COURT: Okay. Do you have anything you want to
 24 cross on?
 25 MR. GEEKIE: Very briefly, your Honor.

1 THE COURT: Okay.
 2 MR. GEEKIE: Promise.
 3 RECROSS-EXAMINATION
 4 BY MR. GEEKIE:
 5 Q For the first time, we heard that you've been hacked.
 6 You didn't testify about being hacked twice by
 7 Mr. Picciolini earlier.
 8 Was that something that your counsel told you to say
 9 during the break when you were talking?
 10 A No, sir.
 11 Q Okay.
 12 A I produced that to you months ago.
 13 Q You didn't testify about it earlier as one of the bad
 14 things Mr. Picciolini --
 15 A I wasn't asked about it earlier.
 16 Q Well, your counsel was asking you questions. You didn't
 17 testify about it.
 18 Did you file a police report of this hacking?
 19 A We spoke to law enforcement --
 20 Q Did you file a police report?
 21 A -- here in Chicago.
 22 I just mentioned what we did. We spoke to law
 23 enforcement here in Chicago.
 24 Q Okay. Chicago Police Department.
 25 A I believe it was the FBI.

1 Q Okay. Did you file a report with the FBI?

2 A I'm not the person to -- who can answer that question. I

3 wasn't there for --

4 Q Who dealt with the FBI?

5 A I believe it was Tony.

6 Q Okay. Now, I'm trying to understand something that you

7 said.

8 You said first that you were applying for the

9 trademarks. And you thought if you got the trademarks, that

10 would stop all the problems. Right?

11 A Yes.

12 Q But then you also said you knew that Christian Picciolini

13 had a strong personality, and he wouldn't stop.

14 A That's true, too.

15 Q Okay. So which is it?

16 A Both.

17 Q Both.

18 So why didn't you send another cease and desist letter

19 if he kept doing stuff?

20 A I believe we were trying to use other remedies that

21 didn't -- it's -- to me, to be honest, it's like talking to a

22 brick wall, so it's pointless to continue to have pointless

23 conversations, so we were trying other remedies. We were

24 trying to exhaust other remedies.

25 Q And that's what took you a full year before filing suit.

1 A Pretty much, yes.

2 Q When did the -- when did the hacks take place by -- the

3 alleged hacks by Mr. Picciolini?

4 A The one I can -- I know for sure by almost a specific date

5 is Giving Tuesday of 2017. And I believe it was shortly before

6 that. That would have been the second time. I believe it was

7 shortly before that. But we were able to regain -- we thought

8 we had put the measures to protect ourselves from that

9 happening again, but apparently not because Christian had

10 inside information to kind of talk his way through that with

11 Facebook directly and got himself put back on the account And

12 then we had to scramble again to get him removed from the

13 account and ourselves added again.

14 Q And did the FBI say why they didn't take any action against

15 Mr. Picciolini?

16 A Again, I wasn't there. You'd have to direct that to Tony.

17 Q And you talked about the press release and all the terms,

18 as Mr. Grothouse said, all these terms of the press release.

19 \$50,000 and a joint statement.

20 The 50,000 would have come out of the 850,000 that

21 Mr. Picciolini had just raised, right?

22 A At that time, we didn't have that much money in the bank

23 Q Okay.

24 A That's not accurate.

25 Q And it was your understanding that Mr. Picciolini was

1 proposing that \$50,000 out of the 850 he had raised, right?

2 A You know, when you talk about Mr. Picciolini, you're

3 talking about him in his role with Life After Hate, not as a

4 donor, as an outside -- he had a fiduciary responsibility to

5 the organization.

6 Q He was a volunteer, right?

7 A He had a fiduciary responsibility --

8 Q That's a legal conclusion --

9 COURT REPORTER: One at a time, please.

10 THE COURT: Yes, you need to let him answer the

11 questions, please, counsel.

12 BY THE WITNESS:

13 A What I understand is he had a responsibility to the

14 organization. Nobody owns the money that a non-profit has

15 BY MR. GEEKIE:

16 Q He didn't claim to own the money, did he? He raised the

17 money, but he didn't claim --

18 A I believe he claimed to own it in his deposition, because

19 he owned the organization.

20 Q Now, let's -- do you disagree that he owned the

21 organization?

22 A An individual cannot own a non-profit. It belongs to

23 the --

24 THE COURT: Let him answer, okay? You need --

25 MR. GEEKIE: I thought he was done. I apologize,

1 Judge.

2 THE COURT: Okay. Thank you.

3 BY THE WITNESS:

4 A He was one of the cofounders, as we testified today.

5 BY MR. GEEKIE:

6 Q Now, the press release, you talked about these conditions.

7 There weren't any conditions if Life After Hate just

8 wanted to issue its own press release, right?

9 A Correct.

10 Q And Life After Hate could have just said Christian

11 Picciolini has been terminated as of today and he has no

12 association with Life After Hate or ExitUSA. Right?

13 A We could have said that, yes --

14 Q Could have said --

15 COURT REPORTER: I don't have the answer.

16 BY THE WITNESS:

17 A He could have said that, as well as a -- or we could have

18 said that, as well as a number of other things.

19 BY MR. GEEKIE:

20 Q And you could have -- yeah, one of the other things you

21 could have said is consumers don't be confused, right?

22 A That, and a number of other things.

23 Q You chose not to issue a press release.

24 A We made a responsible decision not to do that. Yes, sir.

25 Q And if you would have issued the press release that would

1 have avoided confusion, wouldn't it?

2 A That's an assumption. It's not the only outcome.

3 MR. GEEKIE: No more questions, Judge.

4 THE COURT: Okay. Do you have anything else on that?

5 MR. GROTHOUSE: No, your Honor.

6 THE COURT: Okay. You can step down then and join the

7 rest of the table there.

8 THE WITNESS: Thank you.

9 What do I do with these papers? Do I just leave them

10 there?

11 THE COURT: No, give them to the counsel, please,

12 whoever handed them to you.

13 (Witness excused.)

14 THE COURT: And you can call your next witness.

15 MS. SAPER: In the interest of time, your Honor, we'll

16 call Mr. Piccolini up, and then we'll put Mr. McAleer up on

17 after that, if that's okay.

18 THE COURT: Okay. That's fine.

19 Sir, come on over.

20 (Approaching.)

21 THE COURT: Please raise your right hand.

22 (Witness duly sworn and takes the stand.)

23 THE COURT: Okay.

24 MS. SAPER: Sorry, your Honor, just getting organized.

25 MR. GEEKIE: Your Honor, could I ask a question?

1 designed the website, yes.

2 Q I'm going to direct you to Life After Hate's Exhibit 13.

3 MR. MONACO: Your Honor, can you switch the HDMI?

4 THE COURT: Oh, of course, right.

5 Are you HDMI?

6 MR. MONACO: Yes, thank you.

7 THE COURT: There you go.

8 BY MS. SAPER:

9 Q Okay. So I'm directing you to the portion right at the top

10 where your email is listed where it says from Christian

11 Piccolini.

12 Do you see that?

13 A I do.

14 Q Do you recognize your email address?

15 A I do.

16 Q Is that an email from you to Arno Michaelis on

17 November 30th, 2009?

18 A Yes. It's an email from me to Arno Michaelis and the other

19 Life After Hate original cofounders.

20 Q And in this email, are you telling Arno that you think he's

21 doing -- that his website looks great and you're asking him

22 where his name is, and do you ask him -- or tell him that you

23 are spearheading the effort, not me?

24 Is that what it says?

25 A I believe I mentioned he was spearheading the website

1 I presume that you will want me to go through my -- my

2 cross, my direct of Mr. --

3 THE COURT: Right. There's really no reason to

4 recall, so we'll do it that way.

5 Thank you.

6 Especially because there's no jury, so they won't get

7 confused.

8 CHRISTIAN PICCIOLINI, PLAINTIFF'S WITNESS, SWORN

9 DIRECT EXAMINATION

10 BY MS. SAPER:

11 Q Good afternoon.

12 I'm going to start by asking you about Arno.

13 Arno wrote his book "My Life After Hate" without your

14 input; is that correct?

15 A That's incorrect, actually. He asked me to proofread it,

16 and I did give him some feedback on his book.

17 Q The LifeAfterHate.org website was created by Arno; is that

18 correct?

19 A That's incorrect, actually. He physically designed the

20 website, but I provided some of the copy on it, as well as my

21 bio for the website that launched in January 15th, 2010.

22 Q But Arno is the one who registered the domain and initially

23 created the website; is that correct?

24 A I don't recall who -- which one of us registered the

25 domain, but I know he did -- he was a web designer, so he

1 effort and that his name wasn't prominent enough next to mine

2 because our names, mine and Arno's, were the only ones

3 mentioned on the website as founders of Life After Hate.

4 Q Is the next sentence, "I'm honored to be a part, but the

5 world has to know you are leading this project"?

6 A Meaning the website, yes.

7 Q If you look down towards the bottom of the page, there's

8 another email from you to Mr. Michaelis-- am I pronouncing his

9 name right? How is it --

10 A Michaelis.

11 Q Michaelis.

12 MS. SAPER: All the way down. Can you do what he did

13 where he screenshots the main part?

14 BY MS. SAPER:

15 Q All right. All right. Do you -- do you see the same email

16 with your address to Arno at that -- in that section? Dated

17 December 1st, 2009?

18 A I see a different email. But, yes, I see an email from me

19 to Arno and several other of the original -- all the original

20 Life After Hate founders.

21 Q And so you wrote that email. Is that correct?

22 A I believe so, yes.

23 Q Okay. In there, do you say that: "The statement about me

24 is simply not accurate? I don't mind being mentioned as you

25 have it, but it would make me feel a ton better if you could at

1 least use a pseudonym. Please don't make it sound like I came
2 up with the concept. Give credit to yourself for an amazing
3 idea."

4 A Again, we're talking about the website here and not the
5 organization. So the website was designed by him. Arno wanted
6 to put on there that it was designed by both of us, and I was
7 not willing to take credit for that.

8 Q Okay. Let's take it back to the last -- second-to-last
9 page of that exhibit.

10 Okay. Do you recognize this screenshot?

11 A I do because I wrote it.

12 Q Okay. And does the text state that only you and Arno are
13 the cofounders of the Life After Hate website?

14 A That's correct.

15 Q Where does it say that?

16 A In the second paragraph, it said, "Leading this effort is
17 former Chicago skinhead Christian Picciolini, who is in the
18 process of finding a publisher for his memoir," and I actually
19 don't see Arno's name there.

20 Q Right.

21 And does it talk about Life After Hate, the
22 organization, or just you and Arno individually?

23 A Does what? I'm sorry, can you ask your question --

24 Q Does this talk about you and Arno being the founders? Or
25 does it talk about Life After Hate, an organization, owning

1 Q Okay. And at the bottom, there's a footer that talks about
2 copyrights. It says, "Life After Hate" by Life After --
3 "LifeAfterHate.org is licensed under a Creative Commons
4 Attribution," et cetera, et cetera, "license."

5 Is that what you see?

6 A That is what I see.

7 Q And it says, "Based on a work at LifeAfterHate.org." Is
8 that correct?

9 A That is correct, but I also believe that that's referencing
10 the image that was drawn by Bashir Malik that appeared in that
11 first volume. I think this copyright is for the photo, not for
12 the website.

13 Q Okay. Let's move on to Exhibit Number 14. While you pull
14 that up, I'll ask you a few questions.

15 You weren't on the non-stock corporation documents
16 that Mr. Geekie previously introduced into evidence, were you?

17 A I don't have it in front of me so I can't see it.

18 Q Okay. This is labeled for us as Exhibit 14. I know it was
19 tendered as some other exhibit initially.

20 THE COURT: That's okay.

21 BY THE WITNESS:

22 A Yep.

23 BY MS. SAPER:

24 Q So we went through this document earlier.

25 If you look at the initial members, I see an Arno Arr

Picciolini - Direct by Saper

1 this publication?

2 MR. GEEKIE: Objection. Form.

3 THE COURT: It's -- I'm not going to sustain the
4 objection.

5 If he can answer the question, he can answer it.

6 Otherwise, you're going to have to change it.

7 BY THE WITNESS:

8 A Yeah, I can't answer that. I don't know specifically what
9 you're asking.

10 BY MS. SAPER:

11 Q All right. Does the text of this -- doesn't the text of
12 this article also reference the other contributors to this
13 website? For example, "a brilliant writing of a woman whose
14 first two decades of life were shaped by domestic violence"?

15 A Yes. We had many contributors to the website, but that
16 does not mean that they were relevant to the organization as
17 far as members or cofounders. It was initially an online
18 journal that solicited submissions from all over the world. At
19 the same time, I was also leading the intervention work while
20 Arno ran the literary magazine.

21 Q If you look at the top of the page, doesn't the domain name
22 say Arnoarr4.com?

23 A That's correct. This is the test page before he launched
24 it live. He ran the test page on his server so that he could
25 show us before it went live to the world.

Picciolini - Direct by Saper

1 Michaelis, Robert Hasselkus, and a Jeff Pearcy.

2 Your name is not on the non-stock corporation
3 foundation documents, is it?

4 A That's correct. I believe these two are the attorneys that
5 set up -- that filled out the document, but I was a cofounder
6 in December 2009 before this was filed.

7 Q Isn't Manuel --

8 COURT REPORTER: Repeat that, please.

9 BY MS. SAPER:

10 Q Isn't Manuel R. Galang -- isn't Manuel R. Galang Arno's
11 attorney?

12 A I don't know how many attorneys were at that firm.

13 Q But your name is not anywhere on the corporation
14 foundational documents which were filed on February 22nd, 2010;
15 is that correct?

16 A I don't see them on there, no.

17 Q And you never paid any taxes or helped pay for any taxes
18 with respect to this Wisconsin non-profit, did you?

19 A There was never any revenue so there were never any taxes
20 to pay, but I did file several of the year-end meeting minutes.

21 Q When I asked you at your deposition whether you had filed
22 any taxes, you said the answer was no?

23 A Correct.

24 Q And when I asked you if there was -- I'll go back.

25 Were you ever on any bank accounts for this

1 organization?
 2 A Yes.
 3 Q Did you know where those bank accounts were?
 4 A When I opened the Illinois one in 2012, yes --
 5 Q Let me stop you.
 6 I'm asking you about the Wisconsin non-profit, not the
 7 Illinois non-profit.
 8 A That's not what you asked. You said any of these bank
 9 accounts, were you a part of that, and I answered --
 10 Q Were you on --
 11 THE COURT: Now you're doing it. You have to let
 12 people answer the question, please.
 13 BY MS. SAPER:
 14 Q You were not listed as a signatory on any Wisconsin
 15 non-profit bank accounts; is that correct?
 16 A No, because I lived in Chicago and Arno was in Wisconsin,
 17 so they would get sent directly to him. And as executive
 18 director, he would file -- as a board member -- as executive
 19 board chair, I wasn't required to file it.
 20 Q Now I turn you to Life After Hate Exhibit 15 -- I turn your
 21 attention to.
 22 These are Life After Hate's attachments to its
 23 Articles of Incorporation.
 24 Do you recognize these -- this document?
 25 A Yes, I believe I drafted it.

1 Q I see that there are four Board of Directors listed:
 2 Yourself, Frank Meeink, Tony McAleer, and Mike Abramson. Is
 3 that correct?
 4 A Correct.
 5 Q And so there are multiple founders of this Illinois
 6 non-profit; is that correct?
 7 A That is incorrect. There are four board members, but that
 8 does not mean they're founders.
 9 Q At the bottom, it says, "The foundation will utilize the
 10 URL LifeAfterHate.org." Is that correct?
 11 A That is correct.
 12 Q Okay. Then at the last page, the last paragraph, the
 13 document states that, "Upon the dissolution of the foundation,
 14 assets shall be distributed for one or more exempt purposes
 15 within the meaning of Section 501(c)(3)." Is that correct?
 16 A I believe that's what it says, but I also will state that I
 17 don't believe that Life After Hate, Inc. was ever dissolved and
 18 that it still belongs to me. So the use of LifeAfterHate.org
 19 is actually being used fraudulently by your clients.
 20 Q So your testimony today is that the non-profit's
 21 trademark's assets are your individual assets, they belong to
 22 you individually?
 23 A Correct. I designed the logos. I had a free licensing
 24 agreement with my organization to use them. I designed the
 25 websites. I designed the logo for ExitUSA, as well as all of

1 the assets that your clients still use. Never signed any sort
 2 of an agreement to transfer those over.
 3 Q I direct you to Exhibit Number 1.
 4 In 2012, you were the cofounder and executive
 5 director. That was your title at Exit -- sorry, at Life After
 6 Hate, the Illinois non-profit; is that correct?
 7 A I was the only remaining founder at that time, and I
 8 believe I was executive director interim to replace Arno when
 9 we fired him.
 10 Q However, at that time, at least Tony McAleer and Angela
 11 King were also part of the organization's Board of Directors;
 12 is that correct?
 13 A Angela King was not a member of the Board of Directors.
 14 Tony was. Angela King was the only employee of Life After
 15 Hate. Everybody else was a volunteer.
 16 Q Okay. So in your capacity as executive director -- interim
 17 executive director, you terminated Arno in 2012; is that
 18 correct?
 19 A That's correct.
 20 Q And when you terminated Arno, he was still in possession of
 21 the Life After Hate YouTube account; is that correct?
 22 A I believe he was -- yeah, he had most of the assets. I had
 23 about half of them, but there were some that Arno had that
 24 needed to be transferred over, correct.
 25 Q So he also had the Life After Hate and KNW, which stands

1 for --
 2 A Kindness, Not Weakness.
 3 Q -- Kindness, Not Weakness domain names; is that correct?
 4 A That is correct.
 5 Q And he --
 6 A Well, let me take a step back.
 7 We shared a GoDaddy account where they lived. So,
 8 technically, we both own them as the owners.
 9 Q Okay. So I direct you to that -- to that portion of the
 10 page where it says your email address,
 11 Christian@LifeAfterHate.org and it appears that you've emailed
 12 Arno Michaelis on November 6, 2012. Do you recognize this
 13 email?
 14 A I do.
 15 Q Is it an email you wrote?
 16 A I believe so, yes.
 17 Q Okay. In this email, do you ask Arno that his
 18 "commandeering of the LAH YouTube basically means that we
 19 cannot ever register Life After Hate"? Do you state that?
 20 A Yes. "We" meaning me because I was the only remaining
 21 member of Life After Hate at that point.
 22 Q And to be clear, you're emailing this in your capacity of
 23 executive director of Life After Hate, the organization; is
 24 that correct?
 25 A No, I'm actually emailing under the auspices as the only

1 remaining owner of Life After Hate to try and retrieve my
 2 property.
 3 Q Using your LifeAfterHate.org email address; is that
 4 correct?
 5 A Sure. Yes.
 6 Q And then you state as far as -- as far as -- the next
 7 sentence. "As far as the domain transferring and hosting,
 8 please immediately transfer all LAH and KNW associated domains
 9 to GoDaddy. My account is listed under" your personal gmail
 10 email account. "From there," you state that "Tony" -- is that
 11 Tony McAleer?
 12 A I believe so.
 13 Q Tony McAleer was one of the other directors -- codirectors
 14 with you of the Life After Hate organization, the Illinois one?
 15 A That's incorrect.
 16 Q "And I will figure" -- "I will figure out how to attach
 17 them to Life After Hate, Inc."
 18 So in this email, you're explicitly stating I need the
 19 domain names back, and I need to transfer them to the
 20 corporation, not myself; is that correct?
 21 A No, that's incorrect. What I'm talking about is GoDaddy,
 22 and I'm talking about the Life After Hate GoDaddy account.
 23 Q And then you ask Arno, "With respect to CreateSpace and
 24 ISBN, please remove all references in the accounting section to
 25 Life After Hate and Life After Hate banking. We'll be creating

1 our own account in due time and don't want it to conflict." Is
 2 that correct?
 3 A That is correct, because Arno had published his book, had
 4 self-published it and was selling it on CreateSpace and had an
 5 ISBN. And money that was coming in for his book was still
 6 coming in to the Life After Hate account that I owned while
 7 Arno was there, so I didn't want to keep receiving his money,
 8 so I asked him to change it out so that he could receive his
 9 own money.
 10 Q Okay.
 11 MS. SAPER: Can you scroll down, please?
 12 We're going to the email dated Tuesday --
 13 MR. MONACO: Yeah.
 14 MS. SAPER: -- Tuesday, November 20th at 12:00 p.m.
 15 BY MS. SAPER:
 16 Q That's also an email from Christian@LifeAfterHate.org. Is
 17 that your email?
 18 A Yes.
 19 Q And did you email Arno Michaelis on November 20th, 2012
 20 A It appears so, yes.
 21 Q Did you CC Arno -- sorry, did you CC Arno's Life After Hate
 22 email, Tony's LifeAfterHate.org email and Angela King's
 23 LifeAfterHate.org email?
 24 A Yes. I believe the document speaks for itself.
 25 Q And you cc'd these other people because they were also in a

1 leadership position at Life After Hate, the non-profit; is that
 2 correct?
 3 A No, I copied them because I was really -- my goal since I
 4 started Life After Hate has always been to empower formers. I
 5 know it's very difficult for people with prison records to get
 6 jobs, so my goal was always to build Life After Hate with
 7 formers. So what you'll see there is everybody there is a
 8 former. And as part of me trying to empower them, I gave them
 9 certain responsibilities at the organization, even though they
 10 were volunteers. So, yes, I did copy them because I was really
 11 trying to keep everybody in the loop about what was happening.
 12 Q Tony McAleer has the exact same title as you do in the
 13 foundation documents, doesn't he?
 14 A I don't know. I can't see them.
 15 Q We just looked at them a few minutes ago.
 16 A It's not what I looked at, so I don't recall.
 17 Q We'll go back to that just to confirm after we finish this
 18 email.
 19 MS. SAPER: Make your life easier.
 20 BY MS. SAPER:
 21 Q Okay. In that email dated November 20th, 2012, you also
 22 ask of Arno, "And we'll need the YouTube.com Life After Hate
 23 account back, please. I realize your videos are up there, but
 24 the domain is the organization's and belongs to us."
 25 You don't say the domain is mine and belongs to me, do

1 you?
 2 A No, because I owned Life After Hate, and I was speaking
 3 about Life After Hate --
 4 Q And you own Life After Hate, the non-profit?
 5 A I believe I do, yes, and the assets of it, yes.
 6 Q "I hope you'll be considerate and relinquish it. Keeping
 7 it yourself will be confusing."
 8 You recognize that Arno retaining the domains and
 9 YouTube assets and other social media assets would be
 10 confusing; is that correct?
 11 A Yes, but we had a separate conversation about his book,
 12 because he had self-published it and there were copies made,
 13 that we had an agreement that he would talk about his
 14 separation from Life After Hate -- which he did, publicly --
 15 and that we wouldn't have an issue with his book title.
 16 Q Okay. I'm going to direct you to the last page of this
 17 exhibit. An email also written on Tuesday, November 20th,
 18 2012, at 12:19 p.m.
 19 Is this an email -- is this your email,
 20 Christian@LifeAfterHate.org?
 21 A I believe so, yes.
 22 Q Are you emailing Arno Michaelis?
 23 A I believe so, yes.
 24 Q Did you copy Tony McAleer and Angela King?
 25 A I believe so, yes.

1 Q Do you also state, "And the assets of LAH" -- this is to
 2 Arno -- "And the assets of LAH," meaning Life After Hate, "and
 3 KNW belong to the organization."
 4 So you don't say they belong to me, do you?
 5 A No. I was really trying to be nice to him. He had just
 6 been fired, and I was trying to be as gentle as possible with
 7 him so that he would not, you know, throw a fit. Arno had a
 8 history of post-concussion syndrome and not being very kind to
 9 people, which is one reason why we let him go. But, yes, I did
 10 ask him here for those assets. But, again, not for the
 11 organization. I considered myself the organization and
 12 everybody a volunteer.
 13 Q And you also include -- you say, "That includes the YouTube
 14 and your Arno@LifeAfterHate.org email address." Is that
 15 correct?
 16 A If that's what it says, yes.
 17 Q Okay. Sometime in 2015, you were asked to broker on behalf
 18 of Life After Hate, the non-profit in Illinois, the domain name
 19 ExitUSA.org; is that correct?
 20 A No, that's incorrect. I did it myself. I was not asked by
 21 anybody to do that.
 22 Q You consulted with the other directors, including Tony
 23 McAleer, in attempting to purchase that domain; isn't that
 24 correct?
 25 A I kept everybody in the loop for most of my decisions that

1 I made there, but I did that all on my own. I negotiated it on
 2 my own. I purchased it on my own.
 3 Q When you went to purchase the domain, you didn't ask for
 4 the domain personally, did you? For your own personal use, did
 5 you?
 6 A I don't recall.
 7 Q You asked for the domain on behalf of the 501(c)(3)
 8 non-profit that you were executive director of, didn't you?
 9 A I was the owner of that non-profit, and I asked for it --
 10 it wouldn't have made sense if I asked the man who was selling
 11 it to sell it to me. I asked because we were going to launch
 12 this organization, and if I asked for my name it wouldn't have
 13 made much sense. So of course I did say this is what I'm
 14 doing, I'm doing interventions, and I would like to get this.
 15 So, yes, I thought it was -- it was really a play for me to try
 16 and, you know, make this person who was using it for his own
 17 non-profit at the time, you know, understand what it was that
 18 we were doing and how important it is.
 19 Q A non-profit by definition legally cannot have an
 20 individual owner; is that correct?
 21 MR. GEEKIE: Objection. Foundation.
 22 THE COURT: I'm going to just make you rephrase it to
 23 say are you aware, because it's a conclusion of law, and I
 24 don't think you're a lawyer, right?
 25 MS. SAPER: Sure.

1 BY THE WITNESS:
 2 A I am not.
 3 BY MS. SAPER:
 4 Q Are you aware that a non-profit cannot be owned by any
 5 individual?
 6 A Not that I'm aware of, no.
 7 Q Are you aware that a sharehold -- there are no shareholders
 8 of a non-profit?
 9 A I am not aware of that, no.
 10 Q I'm going to direct you to Exhibit 23.
 11 MS. SAPER: And go to this page. Page 595 at the
 12 bottom. Go to the email section.
 13 BY MS. SAPER:
 14 Q I'm showing you an email between yourself and Mr. Richard
 15 Cote.
 16 Is this your email address, CPiccolini@gmail.com?
 17 A Yes. That's my personal email address, correct.
 18 Q And this was dated January 30 of 2015; is that correct?
 19 A Correct.
 20 Q So you wrote this email to Richard Cote, right?
 21 A I believe so, yes.
 22 Q Who is Richard Cote?
 23 A Richard Cote was the owner of the ExitUSA.org domain name.
 24 Don't know what he did other than that. I believe at one point
 25 he was trying to set up a foundation for a right to end life,

1 to exit life. And I researched who owned it, and I reached out
 2 to him. Unfortunately, the gentleman passed away after he had
 3 agreed to sell it to me, so I had to finish the transaction
 4 with his wife.
 5 Q And when you were soliciting the domain from him, you wrote
 6 in the email, would you -- you asked him if he would consider
 7 donating the ExitUSA.org domain to us, "us" meaning the
 8 501(c)(3) non-profit; is that correct?
 9 A That's correct, but he did not do that.
 10 Q And you offered to show him that you had a 501(c)(3)
 11 non-profit paperwork; is that correct?
 12 A I believe so, yes.
 13 Q He ultimately agreed to sell you the domain name that he
 14 had previously registered to Life After Hate, the organization;
 15 is that correct?
 16 A No, that's not correct. He sold it to me.
 17 Q So you solicited the domain for Life After Hate, the
 18 501(c)(3) non-profit, but your representation today is that he
 19 sold it to you individually.
 20 A Right. My belief is that I was the sole owner of Life
 21 After Hate, correct, and all its assets. That Arno had
 22 transferred over to me --
 23 Q You didn't pay --
 24 COURT REPORTER: Repeat that.
 25 BY THE WITNESS:

1 A After Arno left, after we fired him, those assets
 2 transferred to me.
 3 BY MS. SAPER:
 4 Q You didn't pay the \$500 fee out of your own personal bank
 5 account, did you?
 6 A I did actually, yes.
 7 Q Okay. I direct you to --
 8 A Let me just say I -- there were many things that I paid for
 9 out of my pocket, some of which I was reimbursed for and some
 10 of which I was not.
 11 Q I direct you to the document in this batch. Bates stamp
 12 589.
 13 MS. SAPER: It's like the third page.
 14 BY MS. SAPER:
 15 Q All right. Directing you to an email dated Monday,
 16 February 23rd, 2015. Appears to be from you to Richard Cote.
 17 Does that -- do you recognize this email?
 18 A I do recognize the email, yes.
 19 Q And that's your email to Mr. Cote, correct?
 20 A I believe so, yes.
 21 Q And did you in this email say, "Hi, Dick. Just wanted to
 22 let you know that I'm dropping the \$500 check in the mail to
 23 you today for the transfer of the ExitUSA.org" domain -- or
 24 ".org. Please confirm."
 25 Is this something you sent?

1 A Yes, I sent it.
 2 Q And if you look at that, is that a cashier's check? It's
 3 kind of hard to see.
 4 A It's kind of hard to see.
 5 MS. SAPER: Can you blow it up more?
 6 BY MS. SAPER:
 7 Q Okay. So it's a little --
 8 A Again, it's -- I can't make out anything on it.
 9 Q Okay. So it's tough to see, but -- and I'll have another
 10 document so we can see what it is.
 11 But do you remember where -- whether this was a
 12 cashier's check that was drawn from the Life After Hate
 13 non-profit bank account?
 14 A I don't recall.
 15 Q Okay. Let me move this -- let's go to --
 16 THE COURT: Tell you what. Let's take a five-minute
 17 break. Okay?
 18 MS. SAPER: Before we -- I forgot to admit all of
 19 these, or move to --
 20 THE COURT: Okay. They'll be admitted, unless there's
 21 some objection that wasn't voiced at the time.
 22 MR. GEEKIE: I'll look, Judge. I don't think I have
 23 any, but I'll look.
 24 THE COURT: All right. Just five minutes is all.
 25 Thanks.

1 LAW CLERK: All rise. Court is in recess.
 2 (Recess taken from 4:15 p.m. to 4:22 p.m.)
 3 (Proceedings heard in open court:)
 4 THE COURT: You can take the stand again.
 5 (Witness resumes the stand.)
 6 THE COURT: You can pick up where you left off.
 7 MS. SAPER: Am I speaking too quickly?
 8 COURT REPORTER: Yes.
 9 MS. SAPER: Okay. I'll try to slow down. I tend
 10 to -- I felt that I was fast.
 11 THE COURT: And she's fast, so --
 12 MS. SAPER: Yeah. I apologize. I will slow down.
 13 BY MS. SAPER:
 14 Q Okay. So before we had the break, we were reviewing the
 15 method of payment for the ExitUSA.org domain name. Is that
 16 right?
 17 A Yes, I believe so.
 18 Q And I was -- I was -- I asked you whether or not -- let
 19 me -- you didn't pay for that domain name out of your personal
 20 funds, did you?
 21 A Well, at the time, all the Life After Hate funds were my
 22 personal funds.
 23 Q Okay. I'm directing you now to Exhibit 24. Life After
 24 Hate Exhibit 24, the page with Bates stamp Number 3560.
 25 We'll scroll down to the middle of the page where

1 there's an email from you to Angela King and Tony McAleer dated
 2 Friday, January 30th, 2015.
 3 Do you recognize this email?
 4 A I do.
 5 Q This is an email you sent?
 6 A Yes.
 7 Q Okay. And in this email, you're excited because you were
 8 able to negotiate the price of the domain name down to \$500; is
 9 that correct?
 10 A That is correct.
 11 Q And here you say that despite it being \$500, you think it's
 12 a wise investment; is that correct?
 13 A Correct.
 14 Q And this is a wise investment for the organization; is that
 15 correct?
 16 A Well, I just thought that the domain itself, ExitUSA.org,
 17 was a simple domain and that the domain itself was a wise
 18 investment, correct.
 19 Q And then you say, "We just need \$500, any ideas?" Is that
 20 correct?
 21 A That is correct. And the idea was that I would put in the
 22 money, the \$500, to pay for it.
 23 Q And is there a reason you didn't put in the \$500 from your
 24 personal funds?
 25 A I did. I did put in the money from my personal funds. It

1 went into the Life After Hate bank account to cover this.
 2 Correct.
 3 Q So you went to the Life After Hate, the non-profit
 4 organization's bank account to pay the \$500.
 5 A I don't recall, actually. I can't remember what cashier --
 6 if I drew the cashier's check from my personal account and paid
 7 for it and maybe I was reimbursed for it or if Life After Hate
 8 actually -- if it was written that way.
 9 Q All right. So I'm looking -- look at document with Bates
 10 stamp 3561.
 11 In the middle of the document is an email from Angela
 12 King to you.
 13 Is that your email address?
 14 A Yes, I believe we've established that --
 15 Q And this is the email dated Friday, January 30th, 2015.
 16 A Correct.
 17 Q And in that email, Ms. King tells you that, "We can send
 18 it," "we" meaning -- does she mean Life After Hate, the
 19 organization?
 20 MR. GEEKIE: Objection. Foundation.
 21 BY THE WITNESS:
 22 A I don't know.
 23 MR. GEEKIE: Sorry --
 24 BY MS. SAPER:
 25 Q Okay --

1 THE COURT: Okay, hold on. I didn't hear the
 2 objection, so the foundation?
 3 MR. GEEKIE: Yes.
 4 THE COURT: Okay. So that is sustained because it's
 5 speculation.
 6 BY MS. SAPER:
 7 Q Okay. Ms. King's signature line designates her as deputy
 8 director of the -- at -- of the Life After Hate, Inc. Is that
 9 correct?
 10 A Correct. But it does not say cofounder.
 11 Q And she states that she can -- that the money may be --
 12 that the money could be available "as soon as the RTI money
 13 comes in." Is that correct?
 14 A That's what she says, yes.
 15 Q And RTI is a reference to a grant you were applying for; is
 16 that correct?
 17 A I believe so, yes. But I would also say that we couldn't
 18 wait that long, so I ended up covering it.
 19 Q You did receive the grant ultimately, didn't you?
 20 A I don't know which grant you're talking about.
 21 Q The RTI grant.
 22 A I believe we did. We were a co-applicant on an RTI grant
 23 where we had \$50,000 over three years, yes.
 24 Q Okay. I'm directing you to the last page of Exhibit 2 --
 25 actually Exhibit 2.

1 This is a withdrawal -- do you recognize this
 2 document?
 3 A Looks like a withdrawal -- withdrawal slip, yes.
 4 Q Yeah, and this is a withdrawal slip from Chase Bank's Life
 5 After Hate, the corporation, the non-profit corporation's Chase
 6 bank account; is that correct?
 7 A It appears so, yes.
 8 Q And this is a withdrawal slip for the \$500 fee that Life
 9 After Hate paid to Richard Cote; is that correct?
 10 A This is a -- from what I recall, this was a \$500 withdrawal
 11 from Life After Hate to reimburse me for paying for the domain
 12 name.
 13 Q But if it's a withdrawal, if you look at the actual
 14 document, the customer name is Life After Hate; is that
 15 correct?
 16 A That's what it says, yes.
 17 Q And then it says, "If purchasing a cashier's check, provide
 18 the payee name."
 19 Your name is not Richard Cote, is it?
 20 A No, but I -- again, I don't know that that -- that's just
 21 the withdrawal slip. It is not the receipt for the cashier's
 22 check. So I believe that the Richard Cote I wrote in there to
 23 reference what the payment was for. I actually don't recall.
 24 But I don't believe that this is the receipt for the cashier's
 25 check.

1 MS. SAPER: I'd like to move the last few exhibits
 2 into evidence, please, your Honor.
 3 THE COURT: Okay.
 4 MS. SAPER: And, I'm sorry I'm not doing it each
 5 time --
 6 THE COURT: Any objection?
 7 MR. GEEKIE: I think we need to state -- no, but I
 8 think we need to state the numbers that are being moved in.
 9 THE COURT: I think that would be very helpful.
 10 MR. GEEKIE: But I have no objections to --
 11 THE COURT: Okay. So just do it at the end of the
 12 testimony, please. And it has to be an accurate record. Okay?
 13 MS. SAPER: Yes, your Honor.
 14 BY MS. SAPER:
 15 Q Okay. I'm directing you now to Exhibit 17.
 16 Exhibit 17 is the first few pages of a 200-plus
 17 program narrative by RTI, the organization we just referenced.
 18 Is that accurate?
 19 MR. GEEKIE: Objection. Foundation.
 20 MS. SAPER: I agree.
 21 BY MS. SAPER:
 22 Q Are you familiar with RTI?
 23 A I am familiar with RTI, yes.
 24 Q What is RTI?
 25 A Research Triangle Institute. They are a grant farm.

1 Q What is a grant farm?
 2 A They essentially find non-profits that they think that they
 3 can partner with to apply for grants.
 4 Q And RTI doesn't fund individuals, does it?
 5 A I don't know what they do in that regard.
 6 Q To your knowledge, you can't receive a grant from RTI as an
 7 individual, can you?
 8 A I believe you can.
 9 Q Directing you to the document with Bates stamp 1068 at the
 10 bottom.
 11 Towards the end, this document states that "RTI will
 12 partner with Life After Hate to map the process involved in the
 13 onset, persistence, and desistance from extremism."
 14 Do you remember whether that is what the purpose of
 15 the proposal was?
 16 MR. GEEKIE: Objection, your Honor. Foundation.
 17 She's asking the witness to testify about an RTI document.
 18 THE COURT: All right. So I --
 19 MS. SAPER: I --
 20 THE COURT: -- think he just -- he just said that he
 21 wasn't familiar with it, so -- unless he has some more
 22 understanding, you can lay that foundation.
 23 MS. SAPER: I understand, your Honor.
 24 BY MS. SAPER:
 25 Q Were you involved in attempting to obtain this grant from

1 RTI?
 2 A Yes, I was.
 3 Q And so were you familiar with the types of information you
 4 provided to RTI?
 5 A I provided information -- all the information on the
 6 intervention portion, because that's what I was managing, so I
 7 did contribute names of people to be interviewed by them --
 8 Q And this --
 9 A -- that they -- that people agreed to be interviewed for.
 10 Q Around this time is when you were starting to develop the
 11 program for ExitUSA; is that correct?
 12 A No, that's incorrect. I've been doing intervention since
 13 2000.
 14 Q Around --
 15 A Long before Life After Hate.
 16 Q Around this time is when Life After Hate, the non-profit
 17 organization, developed -- was developing its ExitUSA
 18 programming; is that correct?
 19 A That's incorrect. We had been doing interventions-- I had
 20 been doing interventions since the organization started in
 21 2009.
 22 Q And just to be clear, I'm not asking you about
 23 interventions.
 24 I'm discussing the use of the name "ExitUSA" by Life
 25 After Hate, the organization?

1 A No, exit is just a generic term that other organizations
 2 use. It means exit strategies. There's an Exit Sweden,
 3 there's an Exit Norway, there's an Exit UK, there's an Exit
 4 Slovakia that I helped build. None of those groups are
 5 connected to each other. They're not -- at best, they're
 6 friends. But I've been doing exit work since 2000.
 7 Q This -- the last page of this proposal references that it's
 8 going to be helping build on Life After Hate, the non-profit
 9 organization's ongoing efforts to develop ExitUSA.
 10 Do you remember that being part of your proposal?
 11 MR. GEEKIE: Objection. Again, foundation. The last
 12 page, I don't -- I don't know where we are on this.
 13 THE COURT: It says proposal, so it's overruled.
 14 And if you don't -- if you don't know it's your
 15 proposal, then you can say you're not familiar, and she can
 16 show you the document.
 17 BY THE WITNESS:
 18 A I mean, I -- I have not seen this document, so it's hard
 19 for me to comment on who wrote it, what's in it.
 20 BY MS. SAPER:
 21 Q Okay.
 22 A I don't know who wrote this --
 23 Q Does using the document demonstrate --
 24 COURT REPORTER: I'm sorry, would you start over?
 25 MS. SAPER: Sorry.

1 BY MS. SAPER:
 2 Q I am introducing this document --
 3 THE COURT: What document is it?
 4 MS. SAPER: Life After Hate Exhibit 17, to show that
 5 the ExitUSA program was a program of Life After Hate as early
 6 as when -- May 28, 2014, which is the date on this exhibit,
 7 this program narrative. So I'd like to move it into evidence.
 8 THE COURT: Okay. So I don't understand -- you lost
 9 me even.
 10 MS. SAPER: Sorry.
 11 THE COURT: Did he apply for a grant?
 12 MS. SAPER: Yes.
 13 THE COURT: And what is the exhibit? Let me see --
 14 MS. SAPER: The exhibit is the research -- it's the
 15 program narrative in order to submit for -- to get the grant.
 16 THE COURT: Okay. At the time that he applied for it.
 17 MS. SAPER: Correct.
 18 THE COURT: Okay. That's fine. That's admitted.
 19 (Said exhibit received in evidence.)
 20 THE COURT: We assume that he would have seen it.
 21 MR. GEEKIE: He testified he hadn't. And this is --
 22 this is hearsay and foundation, Judge. This is from a third
 23 party. She's introducing it to prove something that's --
 24 THE COURT: How did he submit an application for a
 25 grant?

1 MR. GEEKIE: Pardon me?
 2 THE COURT: How would he have submitted an
 3 application?
 4 MR. GEEKIE: This is -- this is RTI --
 5 THE COURT: Right.
 6 MR. GEEKIE: -- to somebody else. This is prepared --
 7 this appears on the first page --
 8 THE COURT: Give me the document rather than the way
 9 it is on the screen.
 10 MS. SAPER: Here, you can use mine. Exhibit 17.
 11 May I approach --
 12 THE COURT: Not this way. This way.
 13 (Tendered.)
 14 THE COURT: Thank you.
 15 Well, this isn't his proposal, right?
 16 MS. SAPER: I believe it was in part of the -- we
 17 can -- I have other documents. It's not -- later on -- I
 18 have -- Exhibit 19 refers to the actual grant, so we can use
 19 that --
 20 THE COURT: Use the actual grant.
 21 MS. SAPER: Yes.
 22 THE COURT: Okay?
 23 MS. SAPER: The award, I should say. Okay.
 24 BY MS. SAPER:
 25 Q All right. So do you remember whether you -- hold on.

1 Life After Hate, the organization, applied for the
 2 RTI -- RTI grant in May of 2014; is that correct?
 3 A I believe that was the date. We did apply for a grant
 4 around that time.
 5 Q And now I turn you to -- your attention to LAH Exhibit 18.
 6 Do you recognize this document?
 7 A The information in it is recognizable, but I don't know
 8 that I've ever seen this specific document.
 9 Q So I'll just ask you about the information in this
 10 document.
 11 This is a document that I pulled up from the
 12 CyberdriveIllinois.com Secretary of State website.
 13 Oh, no, hold on.
 14 This is a document actually produced by plaintiffs,
 15 which is a receipt of their registration to do business as
 16 ExitUSA.
 17 Do you remember, in your capacity of director and
 18 cofounder, applying for the organization to do business as
 19 ExitUSA?
 20 A Yes, I do. I did apply for it.
 21 Q And was that in April 19, 2014?
 22 A Sounds about right, yes. If that's what it says, I believe
 23 it.
 24 Q You didn't apply to do business as ExitUSA as an
 25 individual, did you?

1 MR. GEEKIE: Objection --
 2 THE COURT: Overruled. Overruled.
 3 BY THE WITNESS:
 4 A Can you repeat the question, please?
 5 BY MS. SAPER:
 6 Q You didn't apply for the ExitUSA doing business as in your
 7 own capacity as an individual, did you?
 8 A No, because ExitUSA was a d/b/a for Life After Hate. But
 9 did I apply for it personally to do business as ExitUSA? No.
 10 But I was the only person doing business as ExitUSA. I was
 11 running that program. I developed the process for it. I
 12 designed the logo, all the intellectual property for it.
 13 Q But the d/b/a was doing -- it was a d/b/a for Life After
 14 Hate, Inc.; is that correct?
 15 A ExitUSA was a program of Life After Hate. It was not a
 16 business.
 17 Q Okay. Now I'm turning your attention to Life After Hate
 18 Exhibit 19.
 19 This is -- Exhibit 19 is the actual grant that
 20 National Institute of Justice gave to support ExitUSA.
 21 Do you remember whether or not you received a grant
 22 from NIJ?
 23 A Yes, we did.
 24 Q And did you receive that grant in 2014?
 25 A I believe so. This -- the full amount was not our grant.

1 Ours was only 50,000 over three years. The rest went to RTI.
 2 Q So Christian Piccolini, the individual, didn't receive the
 3 grant money. Life After Hate, the non-profit, received the
 4 grant money. Is that correct?
 5 A That's correct.
 6 Q And as you see from the grant language at the bottom,
 7 ExitUSA is mentioned; is that correct?
 8 A That's correct. I think that that was a forward-looking
 9 statement because we hadn't -- I hadn't really launched it
 10 yet --
 11 Q Okay, so --
 12 A -- the name.
 13 Q -- after the d/b/a was created for Life After Hate, meaning
 14 Life After Hate, the non-profit, was also doing business as
 15 ExitUSA, you were very resourceful and you were able to find an
 16 agency to provide logo design and branding services for Life
 17 After Hate, the non-profit; is that correct?
 18 A That's incorrect, actually. I designed the logos. They
 19 refined them and made them the colors that they needed to be
 20 for -- to match our website.
 21 Q I'm going to point you to Exhibit 20. Life After Hate
 22 Exhibit 20.
 23 I'm directing you to the email dated December 2nd,
 24 2014.
 25 And this is from you to Tony McAleer, Angela King, and

1 Frank Meeink; is that correct?

2 A It appears so, yes.

3 Q You wrote this email?

4 A I believe so, yes.

5 Q And here you say, "The top ad agencies in Chicago are

6 potentially coming together for us and donating a free website

7 branding, and promotional video we can use as a

8 counter-narrative on YouTube."

9 When you say for "us" and "we," you're referencing

10 Life After Hate, the non-profit; is that correct?

11 A Yes, my organization, Life After Hate.

12 Q Turning you now to Exhibit 21.

13 I'll direct you to the first email in this page, which

14 is called ExitUSA/Approval Batch 1.

15 This email is dated March 6, 2015. It is from a

16 Theresa Stewart at Gravity Tank to yourself, Angela King, Tony

17 McAleer, and a few others who are cc'd that are -- that

18 seemingly are affiliated with Gravity Tank, the agency. Does

19 that sound correct?

20 A Yes.

21 Q Do you remember receiving this document?

22 A Yes.

23 Q And Gravity Tank is an ad agency in Chicago; is that

24 correct?

25 A That is correct, among other things.

1 Q And they're in the business of helping businesses and

2 non-profits develop brands; is that correct?

3 A I would assume so, yes.

4 Q Okay. And the email is essentially discussing the brand,

5 the campaign, and all the different facets of what will be

6 developed; is that correct?

7 A Yes. This is a project that came in through a friend of

8 mine who recognized the work that I was doing with

9 interventions and wanted to help. We weren't raising any money

10 at the time, so the ideas that I came up with was to help

11 design the website for ExitUSA. We talked about a lot of

12 things. What actually ended up happening was that they refined

13 the logos that I designed for ExitUSA and Life After Hate

14 because, while I'm a decent designer, I don't understand

15 Photoshop all that much, so they had to make them high

16 resolution, but I -- the intellectual property was mine. And

17 those were then used in web banners, posters that they

18 designed. They put my logo on there, yes.

19 Q Have you provided -- you haven't provided any emails that

20 show your own sketches or designs, have you?

21 A I believe I did.

22 Q I'll make that a statement.

23 You have not provided any documents that show you

24 independently developed these designs.

25 But, regardless, let's move on.

1 MR. GEEKIE: Objection, your Honor. Ask that that be

2 stricken. It's not Ms. Saper's job to testify.

3 THE COURT: That's correct. It's sustained.

4 BY MS. SAPER:

5 Q Okay. Gravity Tank is an email --

6 COURT REPORTER: I'm sorry, repeat.

7 BY MS. SAPER:

8 Q Gravity Tank isn't only emailing you in these emails; is

9 that correct?

10 A It appears that they've included people from Gravity Tank

11 who I recognize names who were part of the team, and also

12 Angela and Tony who were on a couple of video conferences.

13 So Gravity Tank is based here in Chicago. I sat with

14 them for several sessions, for hours and hours and hours, while

15 Tony and Angela, I believe, were -- you know, I asked them to

16 be a part of it, you know, for video sessions I think maybe

17 once or twice.

18 Q Okay. I'm turning you to Exhibit 22.

19 All right. Let's look at the first page.

20 This email seems to be a document where you, Angela --

21 you and Angela, primarily, are discussing the landing page

22 content of the ExitUSA website.

23 Does that sound accurate?

24 A Yes. This is copy that I wrote that Angela was commenting

25 on.

1 Q Okay. And if you look, it says -- it seems to be an

2 ongoing process where you propose a heading and she responds

3 back, and you guys are hashing out what should go on that page;

4 is that correct?

5 A I was trying to be inclusive and ask people for their

6 feedback because there was an issue, as Sammy stated in his

7 testimony, that I would sometimes do things in a silo because I

8 was always used to doing things alone, so I -- this was an

9 attempt for me to try and get feedback from volunteers at the

10 organization.

11 Q And on page 2, towards the bottom where it says "Mission

12 Statement," you have written -- you wrote this document,

13 correct?

14 A I wrote the original document, but there were some comments

15 on here from other people, yes.

16 Q Right. So did you write: "ExitUSA is a program of Life

17 After Hate"?

18 A I believe so, yes.

19 Q Okay. I'm turning you to page Exit -- Life After Hate

20 Exhibit 25.

21 Do you recognize this document?

22 A Yes. I developed that copy. I developed that tagline.

23 That's the number that I registered, the URL that I purchased,

24 and the logo that I designed.

25 Q And is this something that Gravity Tank refined and donated

1 to the non-profit?
 2 A They put what I designed onto a piece of paper, yes.
 3 Q And the number, "Text or Call 516-500-Exit," that number
 4 didn't go to your personal phone number, did it?
 5 A For a while -- at first it did, and then I had it switched
 6 over to Angela's number.
 7 Q And who would field the questions if someone were to call
 8 this number?
 9 A I would, because the phone calls and the messages would get
 10 emailed to me directly.
 11 Q But this number would forward to a general box that would
 12 be responded to by any potential member of Life After Hate, the
 13 non-profit; isn't that correct?
 14 A That's incorrect. It would come to my
 15 Christian@LifeAfterHate.org email most of the time. I don't
 16 recall if it had been set up anywhere else, but I do know it
 17 came directly to me.
 18 Q And when it would say "visit ExitUSA.org," that domain
 19 directed to Life After Hate's platform; isn't that correct?
 20 A No, it directed to ExitUSA.org's website.
 21 Q Which was a program of Life After Hate, and it was being
 22 operated by Life After Hate, the non-profit; isn't that
 23 correct?
 24 A No, it was being operated by me. I developed it. I
 25 developed the process of intervention. I actually helped the

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1 FBI develop -- they brought me in to develop their intervention
 2 process. It was all based on the work that I had done. And
 3 nobody else, except for maybe one or two, I think, that were
 4 females out of about 160 people at the time that I had been
 5 working with, were ever handled by anybody else. I was the
 6 only one who flew out to meet these people, on my own dime. I
 7 was the one who provided services and counseling for them, and
 8 nobody else did.
 9 Q Let's just look at the other ones quickly. I won't
 10 introduce the entire batch into evidence.
 11 The next page is another collateral created by Gravity
 12 Tank; is that correct?
 13 A It was created by me, and they -- they put it together. So
 14 "There is Life After Hate" is a tagline that I came up with, as
 15 is the other copy.
 16 Q And then also you've got the last one, it says, "ExitUSA
 17 was founded and is run by former hate group members." Not by
 18 Christian Picciolini. Isn't that correct?
 19 A I am a former hate group member, so, yes, I wrote that copy
 20 and --
 21 Q Former hate group members, plural --
 22 A -- it would describe me -- I'm not done speaking yet.
 23 ExitUSA was founded by me. I did the interventions
 24 for it. And I am a former hate group member. I left in 1996.
 25 And for the last 23 years, this is the work that I've been

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1 doing.
 2 Q But the terminology -- the word used is "members," plural,
 3 not singular; isn't that correct?
 4 A Right. We had volunteers who were running it, but it does
 5 not say that they owned it.
 6 Q You own ExitUSA. That's your testimony. Isn't that
 7 correct?
 8 A That is correct.
 9 Q You don't have to ask to get something back that you own;
 10 isn't that correct?
 11 A That is correct. Unfortunately, I've been forced to go
 12 through with these frivolous proceedings because, you know, I
 13 raised \$850,000 for Life After Hate the week they fired me from
 14 the organization that I created. So I have had to fight back
 15 for what belongs to me, yes, Ms. Saper.
 16 Q I'm going to direct you to LAH Exhibit 7.
 17 This is a document dated November 2016, a full year --
 18 almost a full year before you were, let's call it terminated or
 19 disassociated from Life After Hate, the non-profit; isn't that
 20 correct?
 21 A Which part of your statement? There were several parts --
 22 Q The email is dated November 9th -- I'll say -- well, yeah,
 23 the email is dated November 9, 2016.
 24 A That is correct.
 25 Q And your termination from Life After Hate, the non-profit,

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1 was in August of 2017; isn't that correct?
 2 A That is correct. That's when we separated, yes.
 3 MS. SAPER: And I -- I'm not sure if we -- if
 4 defendants' counsel previously introduced this into evidence,
 5 but I'm using it as Life After Hate Exhibit 7.
 6 THE COURT: Okay.
 7 BY MS. SAPER:
 8 Q And this is one of -- one written instance where you
 9 proposed to spin off the ExitUSA name to its -- to yourself;
 10 isn't that correct?
 11 A I proposed spinning off ExitUSA as a separate company so
 12 that we would have more opportunities to apply for grants, yes
 13 Q And you proposed that you lead that effort. Does that --
 14 that means that you weren't the only one leading the effort
 15 before; isn't that correct?
 16 A I don't know that what you're saying is accurate; but, yes,
 17 I did lead the effort the full time.
 18 Q Life after -- Life After Hate, the non-profit, rejected
 19 that proposal to spin off ExitUSA; isn't that correct?
 20 A The board members did, yes.
 21 Q I'll direct you to the second-to-last page in this batch of
 22 exhibits -- of pages in Exhibit 7.
 23 Directing you to an email that Tony McAleer sent you
 24 on November 10th, 2016.
 25 Do you recognize this email?

1 A I do.

2 Q And in that email, does Tony tell you that he doesn't

3 believe spinning Exit off makes sense, especially on the eve of

4 them -- of the organization hopefully obtaining grants?

5 A I believe that's Tony's opinion, yes.

6 Q Okay. And at the bottom of the email, you see Tony

7 McAleer's name. Was Tony McAleer executive director at the

8 time?

9 A Yes, but not a cofounder.

10 Q Was he executive director because you asked to be removed

11 from all legal and financial documents?

12 A I was applying for a contractor position with the FBI to

13 further develop their intervention program, and I was told by

14 them that I needed to separate from Life After Hate.

15 Otherwise, it would have been a conflict of interest. I did

16 not get that job. I pulled out of it to stay with my

17 organization.

18 Q So you couldn't be operating the non-profit.

19 A I didn't get the FBI job, so I never removed myself.

20 Q I'm going to direct you now to Exhibit 8. Life After Hate

21 Exhibit 8.

22 MS. SAPER: This might be the email that was

23 previously introduced, your Honor.

24 BY MS. SAPER:

25 Q This is an email dated Wednesday, August 23rd, 2017. It

1 appears to be from you to Sammy Rangel.

2 Do you recognize this email?

3 A Very much so, yes.

4 Q And is this at least for the second time, at least in

5 writing that I'm aware of, where you suggest that ExitUSA be

6 spinned off to yourself?

7 A I suggested many times over those two years that ExitUSA be

8 spun off and that I run that organization, yes.

9 Q That's true, even though you assert that you own that

10 organization.

11 A So let me explain to you. This is August 23rd. This is

12 the day that I was cut off from the email, cut off from the

13 bank accounts, that -- for money that I raised. I was cut off

14 from access from all the databases. So I was trying to be very

15 nice to them who held, essentially, my future in my hands.

16 This was an attempt by me to do the right thing

17 because I really believed in the mission that I developed and

18 that Arno developed for Life After Hate.

19 This was me being diplomatic, to try and work out a

20 deal.

21 I attempted this several times, to try and broker a

22 deal with them, so that we could go our separate ways. And on

23 multiple occasions, they've refused every time.

24 I was not asking for all the money that I raised. I

25 was asking for enough money to establish the corporation

1 legally.

2 Q I'm going to direct you to Exhibit 48. Life After Hate

3 Exhibit 48.

4 This is -- direct you to the last page.

5 This email is dated Thursday, August 10th, 2017,

6 shortly before you were officially terminated from the

7 non-profit; is that correct?

8 A This is shortly before the organization was taken hostage,

9 yes.

10 Q And this is an email you sent to Sammy Rangel, Angela King,

11 and Tony McAleer; is that correct?

12 A It appears so, yes.

13 Q And this is an email in response to them asking where the

14 location and access is to the domains belonging to Life After

15 Hate, the non-profit; is that correct?

16 A That's correct. This is also the day of the

17 Charlottesville Unite the Right rally where our world turned

18 upside-down like I can't even put into words. It was the most

19 vital point in our mission, and they were asking me to transfer

20 domain names on that day. I was fielding thousands, thousands

21 on that day, of emails that came in from press, that came in

22 from parents who were concerned about their children, who were

23 coming in from people who saw what was happening at the Unite

24 the Right rally and wanted to escape that.

25 So, yes, I did get this email, but I got to tell you,

1 Ms. Saper, it was the last thing on my mind to transfer domain

2 names that day. I was not fired at that point. I was still

3 working with Life After Hate. I could not understand -- other

4 than it being a coup, which I understand it is now -- why they

5 needed on Charlottesville, the day that the rally happened and

6 the whole world was watching why they needed domain names

7 transferred that day.

8 Q You say --

9 COURT REPORTER: Please start over.

10 MS. SAPER: Sorry.

11 BY MS. SAPER:

12 Q You state in the email that every domain is managed through

13 GoDaddy. You reference LifeAfterHate.org, LifeAfterHate.com,

14 Kindness, Not Weak nix -- Kindness, Not Weakness.org, and

15 ExitCanada. Those were domains that were housed in a GoDaddy

16 account that Tony and Angela and Sammy all had access to; is

17 that correct?

18 A It was my account, the Life After Hate account that they

19 had password for, yes.

20 Q But ExitUSA.org wasn't in that list because you moved that

21 domain to your own personal hosting site back in 2016; isn't

22 that correct?

23 A That is correct, yes.

24 Q And you allege that you moved it in 2016 because of a

25 Facebook -- sorry, because of a website hack.

1 A Yes. In October of 2016, I was working with a young girl
2 and her parents who was being catfished by a Russian troll, and
3 our websites were hacked immediately-- or ExitUSA and all my
4 personal websites were hacked. Out of all the organization
5 websites, the only one that was hacked was ExitUSA. I had been
6 on the phone for a week with GoDaddy and with WIX, our
7 developer, and neither one of them was able to help me fix it.

8 Now, our life blood was this website for people to be
9 able to contact me for help with interventions. So I -- the
10 only way that I knew how to do that -- I'm not very technically
11 savvy, I'm a designer, again -- I was accused of hacking
12 something, I don't know the first thing about that -- but what
13 happened was is I had to transfer -- according to GoDaddy, they
14 recommended that I transfer to another domain provider so that
15 we could disengage the malware that it was associated with.

16 Unfortunately, that didn't work, so I kept it there
17 while I continued to work on it.

18 Q So you never intended to keep that domain in your own
19 personal account. You told at least Tony and some of the other
20 directors that you would return it, didn't you?

21 A I was going to return it because I really was very
22 interested in corralling all of the assets that were operating
23 there into one account because it didn't make sense to have
24 them in my personal account, this and that, but I also
25 considered the Life After Hate GoDaddy account, which is one

1 A That is correct.

2 Let me also just point out the date was just nine days
3 after Charlottesville. I can tell you that two years after
4 Charlottesville, it still has not slowed down. And I couldn't
5 give him the Google domain log-in because it was tied to my
6 personal gmail and my personal password, so I was not about to
7 give that up on the day that I was fired.

8 Q You testified in your deposition that you were tech savvy,
9 didn't you?

10 A I used to work for IBM, but I was a marketing operations
11 manager. So I know a little bit about tech, but I don't know
12 how to code.

13 Q Okay. I'm going to direct you to LAH Exhibit 11.

14 This is a document you provided to us; is that
15 correct?

16 A Yes, I believe so.

17 Q It's a -- it's a copy of a, I guess, notice you received
18 from Emmy Express to -- to you; is that correct?

19 A That -- it's addressed to my production company, yes,
20 Goldmill.

21 Q Correct.

22 And so you submitted the videos that you helped
23 develop while you were at Life After Hate, the public service
24 announcements videos, to receive an Emmy; is that correct? One
25 of the videos, I should say.

1 that I started, as my account. So even though eventually I was
2 going to put it back, I was fired and I simply couldn't because
3 I didn't have access to it anymore.

4 Q Oh, your position is you didn't have access to the
5 ExitUSA.org domain name after you were fired?

6 A No, I didn't have access to the Life After Hate titled
7 GoDaddy account because all the passwords, all the bank
8 accounts had been changed without me knowing about them a week
9 before.

10 Q And then I'll direct you to Life After Hate Exhibit 49.

11 This is an email dated Wednesday, August 23rd, 2017.

12 It's an email from you to Sammy Rangel, Tony McAleer,
13 and Angela King.

14 Do you recognize this email?

15 A I'll let you know as soon as he stops moving.

16 Q Yes.

17 A Which email on this page --

18 Q Sorry. The top one. August 23, 2017.

19 A Yes.

20 Q And in that email, do you say, "I'll transfer everything
21 except the ExitUSA domain"?

22 A Yes. That's correct.

23 Q You say, "I can't give you log-in because it's tied to my
24 personal gmail account. I'll get to it when I can. And don't
25 give me ultimatums." Is that correct?

1 A There were four videos created. I created 100 percent of
2 three of them. I wrote them. I directed them. For most of
3 them, I edited them. I had my best friend create some music
4 for them. And I voiced them over. And I designed the logos
5 for them. And I paid for them.

6 Q And you did this --

7 A I'm not done.

8 This is the receipt for the video that my production
9 company submitted and I won an Emmy for, yes, to answer your
10 question.

11 Q When you submitted the video for an Emmy, you titled it
12 Life After Hate/ExitUSA, "There is Life After Hate." Isn't
13 that right?

14 A Yes, they were the client.

15 Q And you explicitly state that ExitUSA is a program of Life
16 After Hate; isn't that correct?

17 A Yes, I believe I've testified to that several times.

18 Q And you developed these videos while you were holding a
19 position at Life After Hate, the non-profit; isn't that
20 correct?

21 A That's incorrect. I was always a volunteer for Life After
22 Hate. I never received a paycheck --

23 Q I didn't say you were an employee. I said while you were
24 holding a position, even a volunteer position.

25 A Yeah, sure.

1 THE COURT: Okay. One or two more questions and then
 2 you're done, okay?
 3 MS. SAPER: Oh, no.
 4 THE COURT: Well, just for today.
 5 MS. SAPER: Okay. I'll just stay in order then.
 6 BY MS. SAPER:
 7 Q Okay. I'm going to direct you to 51. LAH Exhibit 51.
 8 You are the one responsible for the ExitUSA YouTube
 9 account while you were at Life After Hate, the non-profit; is
 10 that correct.
 11 A I was responsible for everything because it was my
 12 organization, yes.
 13 Q And so you had -- you were the one who registered and
 14 controlled the Life After -- sorry, the ExitUSA YouTube page;
 15 is that correct?
 16 A At one point, I did. But once I was fired, because it was
 17 tied to my LifeAfterHate.org email address, which was shut down
 18 without my knowledge, I did not have access to it anymore.
 19 Q Did you upload the Emmy award-winning video to the ExitUSA
 20 YouTube page?
 21 A I uploaded the video that I won an Emmy for to the ExitUSA
 22 page, yes. It was --
 23 Q And in --
 24 A -- made for them.
 25 Q You registered the YouTube account with what email address?

1 A I don't recall, but I -- it likely would have been
 2 Christian@LifeAfterHate.org or some variation of that.
 3 Q So is it your testimony that after you were terminated from
 4 Life After Hate, the non-profit, that you no longer had any
 5 control or access to the Life -- to the ExitUSA YouTube page?
 6 A I don't recall. I don't believe I used it after that. So
 7 I don't know. I don't think I've looked at it.
 8 Q If you look at the last page of this exhibit.
 9 MS. SAPER: Can't flip it?
 10 BY MS. SAPER:
 11 Q Do you recognize this video?
 12 A It is a screen grab from the video that I won an Emmy for,
 13 yes.
 14 Q And is it uploaded to the ExitUSA YouTube page?
 15 A It appears so, yes.
 16 Q And does it have at least 13,000 views as of whatever date
 17 we -- it was published on October 6th. I'm not sure when the
 18 screen grab took place. But at a minimum, there were
 19 13,000-plus views on this video, correct?
 20 A I suppose a lot of people like my video, yes.
 21 Q And then after you were terminated -- actually, I should
 22 point something else out.
 23 You just testified that you didn't have the Exit --
 24 COURT REPORTER: Repeat the question, please.
 25 MS. SAPER: Sorry.

1 BY MS. SAPER:
 2 Q You testified that you were shut out of the YouTube page,
 3 the ExitUSA YouTube page, after your termination; is that
 4 correct?
 5 A I believe so, yes.
 6 Q But if you look at the second page of this exhibit, I've
 7 taken a screenshot of your personal Christian Picciolini
 8 YouTube page.
 9 Does this look like an accurate screenshot of your
 10 personal YouTube page?
 11 A Yes.
 12 Q And on the side, there's a featured channel. It seems that
 13 you've got your Goldmill Group channel, you've got Sinister
 14 Muse -- which isn't Sinister Muse one of your old record labels
 15 or management company --
 16 A Yeah, it's a record label that I used to run, yes.
 17 Q And Goldmill Group is your production company?
 18 A Yes, ma'am.
 19 Q And then I also see ExitUSA, I see that that's your
 20 channel.
 21 A No, that's a channel that I'm subscribed to.
 22 Q Okay. And then I see here that you've uploaded, on
 23 May 11th, on the first page, you've uploaded the same video
 24 that used to be on the ExitUSA page, but you've retitled the
 25 same video not "Life After Hate," but "Free Radicals PSA:

1 There is Life After Hate." Is that accurate?
 2 A That's correct. I own the copyright on that video. I
 3 removed all the ExitUSA logo on it. And I re-purposed it
 4 for -- for my new organization.
 5 Q So to be clear, you gave it a different title than what you
 6 did when you submitted it for the Emmy, and you removed any
 7 markings of Life After Hate from the video so that it could be
 8 associated with the organization, the non-profit Life After
 9 Hate; is that correct?
 10 MR. GEEKIE: Objection. That mischaracterizes his
 11 testimony regarding --
 12 THE COURT: Okay. You can answer the question.
 13 BY THE WITNESS:
 14 A I need you to repeat the question --
 15 THE COURT: I'll repeat it.
 16 (Reading:) So to be clear, you gave it a different
 17 title than what you did when you submitted it for the Emmy, and
 18 you removed any markings of Life After Hate from the video so
 19 that it could be associated with the organization, the
 20 non-profit Life After Hate; is that correct?
 21 BY THE WITNESS:
 22 A There were no "Life After Hate" markings on that video. It
 23 was an "ExitUSA" marking that was on there. And, yes, I didn't
 24 want to create any confusion, so I removed it.
 25 THE COURT: All right. That's where we'll stop for

1 now.
2 So you can step down for now.
3 THE WITNESS: Thank you.
4 THE COURT: We'll pick up again if you're all
5 available on Monday at 10:00 o'clock.
6 Can you do that?
7 MR. GEEKIE: Yes, your Honor.
8 MS. SAPER: We'll make ourselves be available.
9 THE COURT: You want to get this done because I start
10 that big jury trial that you're seeing all get set up on the
11 following week.
12 MS. SAPER: Yeah, and Mr. Grothouse reminded me to
13 move all of the exhibits --
14 THE COURT: Yes, but I do need them to be moved in by
15 name.
16 MS. SAPER: Okay.
17 THE COURT: Do you have the list?
18 MR. SIPCHEN: I did keep a list, your Honor.
19 THE COURT: That's great.
20 MR. SIPCHEN: I am not participating. I understand --
21 I'm just trying to be helpful --
22 THE COURT: That's very nice of you.
23 MR. SIPCHEN: -- so everybody can go home.
24 So with Mr. Picciolini's testimony, I have Life After
25 Hate Exhibit 13, 14, 15, Exhibit 1, 23, all admitted into

1 amount, but not about the document.
2 THE COURT: Okay. I'll take a look at the transcript
3 and see. All right?
4 Thanks, folks.
5 MR. GEEKIE: That's 19.
6 THE COURT: All right. We'll take a look.
7 MR. GEEKIE: Others, no objection, your Honor.
8 THE COURT: All right. Thank you. Those will be
9 admitted.
10 (Said exhibits received in evidence.)
11 THE COURT: And I'll make a ruling on 19 on Monday.
12 See you at 10:00 o'clock.
13 MS. SAPER: Thank you, your Honor.
14 THE COURT: Uh-hum. Have a good weekend.
15 LAW CLERK: All rise. Court is now adjourned.
16 (Proceedings concluded at 5:20 p.m. and scheduled to resume
17 at 10:00 on 2/25/19.)

C E R T I F I C A T E

I certify that the foregoing is a correct transcript of the
record of proceedings in the above-entitled matter.

/s/ GAYLE A. McGUIGAN
Gayle A. McGuigan, CSR, RMR, CRR
Official Court Reporter

March 6, 2019
Date

1 evidence previously.
2 And then I have Life After Hate Exhibit 24, Exhibit 2,
3 Exhibit 18.
4 MS. SAPER: 17. Did we not?
5 MR. SIPCHEN: But I didn't think that one was used.
6 MS. SAPER: Okay.
7 MR. SIPCHEN: Exhibit 18, 19, 20, 21, 22, 25, 7, 8 --
8 8 is actually already in evidence -- 48, 49, 11, and 51.
9 THE COURT: Okay. Do you know if there's any
10 objection to those?
11 MR. GEEKIE: Well, I don't know if 17 was just read
12 in. We objected to 17. That was the RTI.
13 THE COURT: Okay.
14 MS. SAPER: We can remove that.
15 MR. GEEKIE: And then the other one we object to is
16 the document reflecting the RTI grant, but I don't know which
17 number that was.
18 THE COURT: And why do you object to that?
19 MR. GEEKIE: There was no foundation laid. It's a
20 document. There was no foundation --
21 MS. SAPER: No, he said he recognized --
22 COURT REPORTER: I'm sorry --
23 THE COURT: No, he identified it as the amount of
24 funds, and he limited the 740 to just 50,000 from them.
25 MR. GEEKIE: Correct. He -- he testified about the